SITE-SPECIFIC SAMPLING AND ANALYSIS PLAN FOR CONTAINERIZED MATERIALS

STANDARD CHLORINE CHEMICAL COMPANY SITE
KEARNY, NEW JERSEY

Prepared for:

The Peninsula Restoration Group

Standard Chlorine Chemical Co., Inc., Tierra Solutions, Inc.

and Beazer East, Inc.

on behalf of

Standard Chlorine Chemical Co., Inc.

Prepared by:

Key Environmental, Inc.

200 Third Avenue

Carnegie, Pennsylvania 15106

April 29, 2008

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Exhibit "A"

CERTIFICATION
Pursuant to N.J.A.C. 7:26C-1.2

Regarding the *Site-Specific Sampling and Analysis Plan for Containerized Materials* dated April 2008 (collectively, including all enclosures, the "Submission") prepared by Key Environmental Inc. (Key) for the Standard Chlorine Chemical Co. Site (SCCC Site) located in Kearny, New Jersey and submitted herewith by SCCC pursuant to the October 1989 Administrative Consent Order for the SCCC Site, the undersigned officer of Key, does state as follows:

"I certify, under penalty of law that I have personally examined and am familiar with the Submission and that the information provided in the Submission is true, accurate and complete. I am aware that there are significant civil penalties for knowingly submitting false, inaccurate, or incomplete information, and that I am committing a crime of the fourth degree if I make a written false statement that I do not believe to be true. I am also aware that, if I knowingly direct or authorize the violation of any statute, I am personally liable for the penalties."

KEY ENVIRONMENTAL, INC.

James Zubrow, P.G.
Typed/Printed Name

President
Title

Signature

April 29, 2008
Date

Sworn to and subscribed before me on this 29th day of April 2008, by James Zubrow, P.G., President of Key Environmental, Inc., known to me to be the person whose name is subscribed to the within Certification and acknowledged that he executed same for the purposes therein contained.

Signature of Notary Public
(Stamp and Seal/Commission Expiration Date)

NOTARIAL SEAL
JUNE KORDA
Notary Public
PITTSBURGH CITY, ALLEGHENY COUNTY
My Commission Expires Nov 23, 2009

CERTIFICATION
Pursuant to N.J.A.C. 7:26C-1.2

Based on the Certification attached hereto as Exhibit "A" of Jim Zubrow of Key Environmental, Inc. regarding the *Site-Specific Sampling and Analysis Plan for Containerized Materials* dated April 2008 (collectively, including all enclosures, the "Submission") for the Standard Chlorine Chemical Company Site (SCCC Site) located in Kearny, NJ, the undersigned officer of Standard Chlorine Chemical Co., Inc. does state as follows:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted herein including all attached documents, and that based on my inquiry of those individuals responsible for obtaining the information, to the best of my knowledge, I believe the submitted information is true, accurate and complete. I am aware that there are significant civil penalties for knowingly submitting false, inaccurate, or incomplete information, and that I am committing a crime of the fourth degree if I make a written false statement that I do not believe to be true. I am also aware that, if I knowingly direct or authorize the violation of any statute, I am personally liable for the penalties."

STANDARD CHLORINE CHEMICAL CO., INC.

By: _____
Margaret W. Kelly, Esq.
Vice President

Sworn to and subscribed before me this 29 day of April, 2008.

_____
Signature of Notary Public

CRAIG WEXLER
NOTARY PUBLIC, STATE OF NEW YORK
Registration No. 01WE6071493
Qualified in New York County
Commission Expires March 18, 2010

(Stamp and Seal/Commission Expiration Date)

1.0 INTRODUCTION

The New Jersey Department of Environmental Protection (NJDEP) has recently approved an Interim Remedial Action Workplan (IRAW) for the Standard Chlorine Chemical Co Inc (SCCC) Site on Belleville Turnpike in Kearny, New Jersey. The Peninsula Restoration Group (PRG)[1] acting on behalf of SCCC, has begun implementation of the IRAW activities including the offsite disposal of approximately 550 drums of materials currently stored pursuant to NJDEP directions in secure Sealand containers at the Site. Pursuant to the direction of the NJDEP Case Manager for the SCCC Site, the PRG must obtain formal waste classification determinations from the Waste Classification Unit of the NJDEP's Division of Solid and Hazardous Waste (the Waste Classification Unit) for the various types of containerized materials. In connection with this activity, we also have been instructed to consult with the Waste Classification Unit to determine whether any additional data are needed for the Waste Classification Unit to make an appropriate waste classification determination for each type of material.

This purpose of this document, prepared by Key Environmental, Inc. (KEY) for the PRG, is: a) to define the additional sampling and analyses activities needed to support Waste Classification Requests for the various types of containerized materials; and b) to present a Site Specific Sampling and Analysis Plan (SSSAP) which addresses those additional sampling and analysis activities.

All the materials discussed herein were generated as a result of previously completed Remedial Investigations (RIs) and Interim Remedial Measures (IRMs) conducted at the SCCC Site pursuant to NJDEP-approved work plans. The materials have been segregated by type since their creation, and maintained in NJDEP-approved locations. With the exception of a few drums, all containers are labeled according to material type and source. As described in Section 2.4 hereof, a substantial amount of characterization data for the containerized materials has been obtained previously. It is the PRG's intent to utilize the existing data for waste classification purposes where appropriate and to collect additional samples for analysis to supplement the existing data where necessary in accordance with the SSSAP presented herein. We are requesting Waste Classification Unit approval of this SSSAP because the materials of interest are all stored in small containers (e.g., drums and bags), and the NJDEP Guidance and Instructions for Waste Classification Requests states that under these circumstances a SSSAP must be approved by the NJDEP prior to sampling.

Following approval of the SSSAP, the PRG will implement the plan and other activities necessary for the off-site disposal of the containerized materials in accordance with the following schedule (See Attachment A).

[1] The PRG is comprised of SCCC, Beazer East, Inc. and Tierra Solutions, Inc. (Tierra).

Note: As indicated below, the PRG has integrated the TSD facility procurement process with the waste classification process so as to expedite the overall schedule.

- Within 105 calendar days[2] of receipt of the Waste Classification Unit's approval of this SSSAP, the PRG will prepare and submit material-specific Waste Classification Request Forms (HWM-009) to the Waste Classification Unit for determination of the waste classifications of the containerized materials.

- During the sampling task, the Treatment, Storage and Disposal (TSD) facilities that, for permit compliance purposes, require additional data not addressed in the previous sampling results of this SSSAP, will collect the samples for such purposes.

- Within 90 calendar days of receipt of the Waste Classification Unit's determination of the waste classification of the containerized material, the PRG will arrange for and complete the removal of the containerized material from the SCCC site to appropriate TSD facilities.

A summary of relevant background information is provided in Section 2.0. This information includes:

- Site Ownership History and Site Operations History;

- Description of raw materials used, products manufactured and processes employed at the Site;

- Description of the containerized material;

- Origin of the containerized materials and dates produced; and,

- Summary of existing information and data for the containerized materials.

The proposed sampling plan is included as Section 3.0. The sample collection procedures, analytical parameters and methods and data evaluation considerations are described in this Section.

[2] The duration of this task is based on the following components: mobilization for sampling - 15 days; sampling - 15 days; laboratory analysis - 60 days; and, preparation of the Waste Classification Request Forms and supporting documentation - 15 days.

2.0 BACKGROUND INFORMATION

Information concerning historical property ownership, raw materials used and products produced, and manufacturing processes employed at the Site are described in the following subsections. Additionally, descriptions of the containerized materials, their origin, dates of production and existing information/data are presented. The information presented in this Section has been obtained from historical Site documents including submissions to the NJDEP pursuant to various NJDEP-approved work plans and reports.

2.1 GENERAL SITE DESCRIPTION AND CURRENT OWNERSHIP

The SCCC Site consists of approximately 25 acres of property of contiguous parcels owned by two related entities. Standard Naphthalene Products Co, Inc. (SNP), a wholly-owned subsidiary of SCCC, owns the Lots 48, 49, 51, 52 and 52R (collectively, the SNP Property), located at 1015-25 Belleville Turnpike and consisting of approximately 16.6 acres. SCCC owns Block 287 Lot 50 (the SCCC Property), located at 1035 Belleville Turnpike and consisting of approximately 8 acres located in the southwestern portion of the Site. Figure 1 is a property plan that shows the various parcels which comprise the Site. The ownership and operations histories for the SNP and SCCC properties, respectively, are set out below. As described more fully in Section 2.4, most of the containerized materials originated in or near Building 18 on Lot 49 of the SNP property.

2.2 SNP PROPERTY OWNERSHIP AND OPERATIONS

2.2.1 SNP Property Ownership History

- 1916: Newark Factory Sites, Inc. sells the undeveloped Lots 48 and 49 to The White Tar Co. of N.J., Inc. (White Tar), which became a wholly-owned subsidiary of Koppers, Inc. in 1928.

- 1942: White Tar sells Lots 48 and 49 to the Koppers Company which in turn conveyed it to the Koppers Company, Inc. in 1944 (Koppers Company and the Koppers Company, Inc., individually and collectively, "Koppers") Koppers is now known as Beazer East, Inc. (Beazer).

- 1946: Thomas A. Edison, Inc sells Lots 51, 52, and 52R to Koppers.

- 1962: SNP acquires the entirety of the property from Koppers.

2.2.2 SNP Property Operations History

Overview: Manufacturing operations were conducted on the SNP property between 1916 and 1980 or 1981. The White Tar/Koppers facility at the Site refined crude coal tar naphthalene to produce naphthalene products and disinfectants from 1916 to 1962. White Tar also manufactured sulfur candles. In the course of its manufacturing operations, Koppers processed approximately 11,000 tons of crude coal tar naphthalene and naphthalene oil each year. The crude naphthalene, which was a solid, was transported by rail from the adjacent Koppers Seaboard Site (or, occasionally, imported and stored in burlap bags). Additional raw materials in the naphthalene refining process included caustic soda and sulfuric acid. Raw materials used in the production of disinfectants by Koppers included resin, castor oil, petroleum tar acids, pine tar oil, linseed oil, tar acid oil, coal tar acids, steam distilled pine oil, caustic soda, kerosene, neutral oil, caustic potash, ligrow and solvent oil. In addition to the refined naphthalene and disinfectants, Koppers also manufactured, stored and packaged paradichlorobenzene moth preventatives and deodorizers in solid form at the site.

SNP's operations at the Site included the manufacturing of moth balls, crystals, and flakes from refined petroleum naphthalene. Between 1963 and 1980 SNP processed liquid petroleum naphthalene purchased from Sun Oil and transported by rail to the Kearny site for conversion into moth preventatives. SNP never engaged in the refining of crude naphthalene or naphthalene oil at the Site. Between 1964 and 1979/80, SCCC leased a portion of Lot 49 for use in the separation of dichlorobenzenes to produce paradichlorobenzene moth preventatives and ortho-dichlorobenzene for Cloroben's drain cleaning formulation operations. For a period during the 1970s, Building 18 was also used for the separation of trichlorobenzenes. Records indicate that the only chemical processing activities conducted on the SNP Property took place exclusively on Lot 49, which also was the location of some storage, packaging and warehouse activities. The remaining parcels were used for related ancillary manufacturing and packaging operations (Lots 48, 51), storage of raw materials (Lots 51 and 52) and finished goods (Lot 48). Process lagoons located on Lot 52 received process wastes from naphthalene refining and trichlorobenzene separation prior to mid-1979. A somewhat more detailed description of the uses of the individual Lots is provided below:

Lot 48 – During the White Tar and some of the Koppers years, Building No. 5 housed offices and candle manufacturing operations. Thereafter it served as the principal finished goods packaging and storage area for pure naphthalene and paradichlorobenzene moth preventative products and disinfectants. During a limited period, packaged Cloroben drain cleaning products (principally sulfuric acid and hydrochloric acid formulations) were also stored there prior to shipment. Since it is known that several small boilers were once located in Building No. 6, fuel oil was probably used in that

building at one time. The other buildings were used only for support activities that did not involve the use of chemicals. There are no records of bulk storage on Lot 48.

Lot 49 – As stated above, the only chemical processing activities known to have been conducted on the SNP Property at any time took place exclusively in buildings and equipment located on Lot 49.

The naphthalene refining process conducted first by White Tar and subsequently by Koppers until the early 1960s included a washing operation by which coal tar acids, coal tar bases and coal tar oils were removed from the crude naphthalene. The washed materials then were refined and processed in Building 18 located in the center of that Parcel. From the mid-1930s until the early 1960s waste residues from these operations were discharged from Building 18 to the adjacent "lagoons" located on Lot 52. In addition, Koppers discharged boiler blow down to the septic system. Storage of raw materials, processed materials and refined naphthalene also occurred on Lot 52.

SNP operations on Lot 49 involved subliming (the conversion of liquid naphthalene to gas to solid) in a subliming chamber, the flaking, crushing and balling of the solid naphthalene, and the packaging into finished moth preventive products. The only raw material used in these processes was pure refined petroleum naphthalene.

From late 1962 until approximately 1980, Building 18 and the equipment located in it was leased to SCCC, which used it for the separation of dichlorobenzenes in connection with its the manufacture of paradichlorobenzene moth crystals and flakes; for a limited period in the 1970s, SCCC used Building 18 for the separation of trichlorobenzenes. Storage tanks for these materials were located adjacent to Building 18. Records indicate that the dichlorobenzene separation operations did not generate process wastes. They also indicate that some process wastes from the trichlorobenzene separation operations were placed intermittently in the adjacent process lagoons between 1975 and mid-1979. Raw materials used in SCCC's operations included technical dichlorobenzenes and trichlorobenzenes, which were transported to the plant principally by rail and secondarily by tank truck. SCCC also stored 1,2,4,-trichlorobenzene on the SNP Property from 1974 to 1980.

Other historical manufacturing-related activities conducted on Lot 49 included: conversion of refined naphthalene and paradichlorobenzene into various solid forms, manufacture of naphthalene disinfectants, as well the storage of finished goods (naphthalene, sulphur candles and disinfectants).

Lot 51 – Records indicate that Lot 51 was used by Koppers from approximately 1946 until the early 1960s for activities related to coal tar naphthalene refining, manufacturing and storage operations involving the use and storage of crude naphthalene, Additional raw materials used in the naphthalene refining process included caustic soda and sulfuric

acid. Raw materials used in the production of disinfectants included resins, castor oil, petroleum tar acids, pine tar oil, linseed oil, tar acid oil, coal tar acids, steam distilled pine oil, caustic soda, kerosene, neutral oil, caustic potash, ligrow, and solvent oil. No chemical processing, manufacturing or storage activities have been conducted on Lot 51 since it was acquired by SNP in 1962.

Lot 52 – No manufacturing was ever conducted on Lot 52. This lot has two process lagoons, consisting of an excavated area of approximately 33,000 sq. ft. As described more fully above, these received certain process wastes prior to mid-1979 when their use was permanently discontinued. Records also indicated that for some period of time Lot 52 also was also used by Koppers for storage of raw naphthalene.

Lot 52R – No manufacturing, chemical storage or waste activities are known to have occurred on Lot 52R.

2.3 SCCC PROPERTY

2.3.1 SCCC Property Ownership History

- 1918: Thomas A. Edison acquires the property from James H. Rhodes and Co. Edison and/or individuals and entities related to Edison (collectively, "Edison") owned the property continuously until 1954.
- 1954: Crown Rubber Products (Crown Rubber) acquires the property from Thomas A. Edison, Inc.
- 1959: Keaton Rubber Co. (Keaton Rubber) acquires the property from Crown Rubber Products, Inc. in September, 1959.
- 1962: SCC acquires the property in October 1962.

2.3.2 SCCC Property Operations

Overview: Various manufacturing operations were conducted on the SCCC Property from the late 1920s (when buildings were erected on the property) until 1993 when all manufacturing operations were discontinued. These operations are summarized below:

- From the late 1920s until the early 1950s Edison operated an automobile battery manufacturing facility on the property. During those years the buildings were used as follows: Building No 1 – Engineering Dept and offices; Building No. 2 - manufacturing building; Building No. 3 – Maintenance; Building No. 4 – Boiler

House. (Note: from the late 1920s into the 1930s, these operations were run by a tenant, the Emark Battery Corporation, an Edison subsidiary.

- In the mid-1950s Crown Rubber operated a facility for the manufacture of molded rubber products on the property. To date, no documents have been found which provide details about these operations.

- To date, no information has been found regarding the operations conducted at the property by Keaton Rubber.

- From 1959 until the 4th quarter of 1963, Tanatex Chemical Corporation (Tanatex) leased Building No. 3 and the second floor of Building No. 1. Tanatex operated a dye-carrier manufacturing facility in these buildings. Records indicate that Tanatex used Building No. 3 for the manufacture of the dye carrier formulations and operated a laboratory on the 2nd floor of Building No. 1. To date no information has been found regarding Keaton Rubber's operations at the property.

- From late 1963, Cloroben Chemical Corporation (Cloroben), an SCCC subsidiary, operated a small batch formulation and blending operation for various drain cleaners known as "Cloroben" in Building No 2. Until 1981, some Cloroben products were formulated from orthodichlorobenzene, which was stored in tanks adjacent to Building No. 2. Cloroben formulation operations in Building No. 2 also included the use of methyl benzoate, hydrochloric acid and sulfuric acid which were also stored onsite. All manufacturing operations were discontinued in 1993.

2.4 DESCRIPTION OF CONTAINERIZED MATERIALS

As stated above, the containerized materials consist of approximately 551 drums and 8 plastic bags currently stored in six locked Sealand containers in an area to the north of Building 2. The containerized materials were produced as a result of previous RIs and IRMs completed at the Site. The materials were placed in containers at the time those activities were conducted, segregated by origin and type and stored securely in various locations at the Site in appropriately labeled containers pursuant to NJDEP instructions and under NJDEP supervision. In 2000, at the direction of the NJDEP, these containers were: a) inventoried in May, 2000; and b) renumbered and consolidated in the Sealand containers in November, 2000. This work was undertaken by Enviro-Sciences, Inc. (ESI) on behalf of SCCC.

In connection with these activities ESI prepared and submitted to NJDEP an initial May inventory sheet and a final November inventory of the renumbered containers. These are attached as Attachments B and C respectively. Identification of drums in this SSSAP follows the numbering found in the November 2000 ESI Inventory.

A significant amount of characterization information (including chemical analyses) exists for many of the materials. Some chemical characterization of the materials was completed as part of the RI and IRMs; some additional characterization was done by ESI in conjunction with its inventory activities in 2000.

Based on the review of the inventory and existing characterization data, the materials have been placed into 19 groups of like materials for waste characterization purposes. Table 2-1 presents a summary of the existing information regarding the container contents, material quantities and volumes, origin, dates of production and existing characterization data.

2.4.1 Description of Materials by Type and Origin

A summary of existing data/information and conclusions with respect to need for additional sampling and analysis for each group of similar containerized materials is presented below.

Group A: Asbestos Containing Materials (ACM)

- **Material Description:** friable and non-friable asbestos-containing insulating materials.
- **Quantity (Volume):** Approximately 99 cubic yards (362 57-gallon drums and 8 plastic bags of oversized material.
- **Origin:** 1991 IRM for the over-packing of bagged ACM materials from a 1988 dioxin RI/asbestos abatement IRM conducted in Building No. 18 and stored in the sealed distillation pot in that building.
- **Location:** 362 PVC drums and 8 plastic bags (*See* attached Table 1 in Attachment C for drum numbers and Sealand Container ID).
- **Existing Data Summary:** 12 samples were previously collected and analyzed for various parameters, including: RCRA characteristics, Total VOCs, Total SVOCs, total chromium, hexavalent chromium, and dioxin/furans.
    - See Table 1 for analytical results
- **Additional Sampling and Analysis Proposed:** Yes.
    - **Proposed number of samples:** 25 discrete samples from 25 different drums, composited into 5 samples for analysis

- **Proposed analytical parameters:** RCRA Characteristics (ignitability, pH, reactivity); TCLP Metals; TCLP VOCs; TCLP SVOCs; and PCBs.

Group B – Residual Contents - AST No. 9 and No. 13

- **Material Description:** Tank scale and rust from AST No. 9 and No.13 located near Building No. 18 on Lot 49 (Weston 1993 RI Report pp 3-3).
- **Quantity (Volume):** Approximately 11.4 cubic yards (42 drums).
- **Origin:** The material was removed from these ASTs located in the former process area as part of an IRM on Lot 49 performed in 1990. These tanks were last used on or before July 1979.
- **Location:** 42 PVC drums (*See* attached Table 1 in Attachment C for drum numbers and Sealand Container ID).
- **Existing Data Summary:** Four samples were collected and analyzed for the following parameters: RCRA characteristics, TCLP VOCs, TCLP SVOCs, TCLP Metals, Total SVOCs, Dioxin/Furans and PCBs.
  - See Table 2 for analytical results
  - TCLP are below limits, non RCRA characteristic, SCA (Non-regulated per generation date, 147 ppm Arochlor 1242, Weston 12/90, 1/91 Report). PCB data are considered false positive due to analytic interference (Weston 1993 RI Report, pp 5-1).
- **Additional Sampling and Analysis Proposed:** Yes
  - **Proposed Number Of Samples**: Five discrete samples composited into one sample for analysis.
  - **Proposed Analytical Parameters:** PCBs, BTUs Total Organic Halogens (TOX) and ammonia.

Group C – Residual Contents – AST No. 10

- **Material Description:** Solidified trichlorobenzene product residues from Tank 10 from the eastern area (Weston 1993 RI Report, pp 3-3).
- **Quantity (Volume):** Approximately 3 cubic yards (11 drums).

- **Origin:** The material was removed from AST 10 as part of an IRM conducted in 1990 in the former process area on Lot 49.

- **Location:** 11 PVC drums (*See* attached Table 1 in Attachment C for drum numbers and Sealand Container ID).

- **Existing Data Summary:** Two samples were collected and analyzed for the following parameters: RCRA characteristics, TCLP VOCs, TCLP SVOCs, TCLP Metals, Total SVOCs, Dioxin/Furans and PCBs.

    - See Table 3 for analytical results.

    - TCLP are below limits, non RCRA characteristic, PCB one sample > 500 mg/kg. Note: PCB data are considered false positive due to analytic interference (Weston 1993 RI Report, pp 5-1).

- **Additional Sampling and Analysis Proposed:** Yes

    - **Proposed Number Of Samples**: Five discrete samples composited into one sample for analysis.

    - **Proposed Analytical Parameters:** PCBs, BTU, TOX and ammonia.

Group D – Residual Contents – AST No. 11

- **Material Description:** Liquid and Sludge from AST No. 11 located on Lot 49 (Weston 1993 RI Report, pp 3-3).

- **Quantity (Volume):** Approximately 7 cubic yards (25 drums).

- **Origin:** The material was removed from AST No. 11 as part of an IRM performed in 1990 on the Lot 49 former process area.

- **Location:** 25 PVC drums (*See* attached Table 1 in Attachment C for drum numbers and Sealand Container ID).

- **Existing Data Summary:** Two samples were collected and analyzed for the following parameters: RCRA characteristics, TCLP VOCs, TCLP SVOCs, TCLP Metals, Total SVOCs, Dioxin/Furans and PCBs.

    - See Table 4 for analytical results.

- TCLP are below limits, non RCRA characteristic, PCB > 500 mg/kg. Note: PCB data are considered false positive due to analytic interference (Weston 1993 RI Report, pp 5-1).

- **Additional Sampling and Analysis Proposed:** Yes

  - **Proposed Number Of Samples**: Five discrete samples composited into one sample for analysis

  - **Proposed Analytical Parameters:** PCBs, BTU, TOX and ammonia.

Group E – Residual Contents - AST No. 12

- **Material Description:** Solidified trichlorobenzene product residues from Tank 10 from the eastern area (Weston 1993 RI Report, pp 3-3).

- **Quantity (Volume):** Approximately 5 cubic yards (17 drums)

- **Origin:** The material was removed from Above-Ground Storage Tanks located in the former process area as part of an Interim Remedial Measure performed in 1990.

- **Location:** 17 PVC drums (*See* attached Table 1 in Attachment C for drum numbers and Sealand Container ID)

- **Existing Data Summary:** Two Samples were collected for the following parameters: RCRA Characteristics, TCLP VOCs, TCLP SVOCs, TCLP Metals, Total SVOCs, Dioxin/Furans and PCBs.

  - See Table 5 for analytical results.

  - TCLP are below limits except for trichlorophenol, potentially ignitable, PCB > 50 mg/kg.

  - Existing PCB data are considered false positive due to analytic interference (Weston 1993 RI Report, pp 5-1).

- **Additional Sampling and Analysis Proposed:** Yes

  - **Proposed Number Of Samples**: Five discrete samples composited into one sample for analysis

- **Proposed Analytical Parameters:** PCBs, ignitability, TCLP SVOCs, BTU, TOX and ammonia.

Group F – Residual Contents – ASTs Nos. 9, 10, 11, 12 or 13 (Drums numbered but otherwise unmarked)

- **Material Description:** Based on the drum numbers and information on May 2000 inventory, it is believed that these containers also contain residual contents of the Lot 49 ASTs.
- **Quantity (Volume):** Approximately 4 cubic yards (14 drums)
- **Origin:** Believed to be residual material removed from AST Nos. 9-13 as part of an IRM performed in 1990 on Lot 49
- **Location:** 14 PVC drums (*See* attached Table 1 in Attachment C for drum numbers and Sealand Container ID)
- **Existing Data Summary:** No data currently identifiable.
- **Additional Sampling and Analysis Proposed:** Yes
  - **Proposed Number Of Samples:** Five discrete samples composited into one sample for analysis
  - **Proposed Analytical Parameters:** TCLP VOCs, TCLP SVOCs, TCLP Metals, RCRA Characteristics and PCBs, BTU, TOX and ammonia.

Group G - AST IRM -Unmarked Liquids

- **Material Description:** Liquid (possibly rain water from open man-ways on two of the ASTs (Weston IRM Workplan 2/90)
- **Quantity (Volume)** Approximately 110 gallons (2 drums)
- **Origin:** Believed to be liquid collected from two ASTs during the AST IRM performed in 1990 on Lot 49
- **Location**: 2 PVC drums (*See* attached Table 1 in Attachment C for drum numbers and Sealand Container ID)
- **Existing Data Summary:** No data currently identifiable

- **Additional Sampling and Analysis Proposed:** Yes
  - **Proposed Number Of Samples**: Two discrete samples composited into one sample for analysis
  - **Proposed Analytical Parameters:** TCLP VOCs, TCLP SVOCs, TCLP Metals, RCRA Characteristics and PCBs.

Group H – Used Personal Protective Clothing (PPE)

- **Material Description:** Used PPE
- **Quantity (Volume):** Approximately 6 cubic yards (22 drums)
- **Origin:** PPE used during the 1990 IRM completed for the ASTs located in the former process area on Lot 49. (Note: Twenty-one drums are labeled "AST PPE", one drum is simply described as PPE)
- **Location:** 22 PVC drums (*See* attached Table 1 in Attachment C for drum numbers and Sealand Container ID)
- **Existing Data Summary:** No data currently exist.
- **Additional Sampling and Analysis Proposed:** Yes
  - **Proposed Number Of Samples**: Five discrete samples composited into one sample for analysis
  - **Proposed Analytical Parameters:** TCLP VOCs, TCLP SVOCs, TCLP Metals, RCRA Characteristics and PCBs.

Group I - AST IRM Trash

- **Material Description:** Trash associated with the 1990 AST IRMs
- **Quantity Volume:** Approximately 2 cubic yards (8 drums).
- **Origin:** Trash produced during the 1990 IRM completed for the five ASTs (Nos.9-13) located in the former process area on Lot 49.
- **Location:** 8 PVC drums (*See* attached Table 1 in Attachment C for drum numbers and Sealand Container ID).

- **Existing Data Summary:** No data currently exist.
- **Additional Sampling and Analysis Proposed:** Yes
    - **Proposed Number Of Samples**: Five discrete samples composited into one sample for analysis
    - **Proposed Analytical Parameters:** TCLP VOCs, TCLP SVOCs, TCLP Metals, RCRA Characteristics and PCBs.

Group J – IRM/RI Cement and Construction Debris

- **Material Description:** Cement and construction debris
- **Quantity (Volume):** Approximately 0.25 cubic yards (1 drum)
- **Origin:** Prior IRMs or RI work at the Site
- **Location:** 1 PVC Drum (*See* attached Table 1 in Attachment C for drum number and Sealand Container ID)
- **Existing Data Summary:** No data currently exist.
- **Additional Sampling and Analysis Proposed:** Yes
    - **Proposed Number Of Samples**: One discrete sample
    - **Proposed Analytical Parameters:** TCLP VOCs, TCLP SVOCs, TCLP metals, PCBs.

Group K –Machine Oil

- **Material Description:** Machine Oil
- **Quantity (Volume):** Approximately 55 gallons (1 drum).
- **Origin:** Unspecified RI or IRM (moved to Sealand container from Building No. 5 storage location
- **Location:** 1 Steel drum (*See* attached Table 1 in Attachment C for drum numbers and Sealand Container ID)

- **Existing Data Summary:** Two samples were collected and analyzed for RCRA Characteristics, TCLP VOCs, TCLP SVOCs, and TCLP Metals.
    - See Table 6 for analytical results
- **Additional Sampling and Analysis Proposed:** Yes
    - **Proposed Number Of Samples**: One discrete sample
    - **Proposed Analytical Parameters:** TCLP VOCs, TCLP SVOCs, TCLP metals, PCBs, RCRA Characteristics, BTU, TOX and ammonia.

Group L – Drill Cuttings - Lagoon Area RI

- **Material Description:** Solids (drill cuttings)
- **Quantity (Volume):** Approximately 3 cubic yards (11 drums)
- **Origin:** The material was produced during the 1987 dioxin RI sampling event conducted in the vicinity of the lagoons on Lot 52.
- **Location:** 11 Steel (Overpack) drums (*See* attached Table 1 in Attachment C for drum numbers and Sealand Container ID)
- **Existing Data Summary:** Samples were collected for analysis of the following parameters: Total VOCs, Total SVOCs, Total Metals and Dioxin/Furans.
    - See the attached data tables for analytical results.
- **Additional Sampling and Analysis Proposed:** Yes
    - **Proposed Number Of Samples**: Five discrete samples composited into one sample for analysis
    - **Proposed Analytical Parameters:** TCLP VOCs, TCLP SVOCs, TCLP Metals, RCRA Characteristics, PCBs, TOX, BTUs, and ammonia.

Group M – Drill Fluids – Lagoon Area FRI

- **Material Description:** Focused Remedial Investigation (FRI) Drill Fluids
- **Quantity (Volume):** Approximately 605 gallons (11 drums)

- **Origin:** The fluids were produced during the 1996 FRI conducted on Lots 49 and 52 (ERM 1996).

- **Location:** 11 PVC drums (*See* attached Table 1 in Attachment C for drum numbers and Sealand Container ID)

- **Existing Data Summary:** Two samples were collected for analysis of the following parameters: RCRA Characteristics, TCLP VOCs, TCLP SVOCs, and TCLP Metals.

  - See Table 7for analytical results.

- **Additional Sampling and Analysis Proposed:** No - Existing data show that the material is characteristic for chromium (D007)

Group N – Supplemental Remedial Investigation (SRI) Drill Cuttings

- **Material Description:** Drill cuttings from soil boring drilling

- **Quantity (Volume):** Approximately One Cubic Yard (4 drums)

- **Origin:** The drill cuttings were produced during soil boring drilling conducted as part of the 1998-1999 SRI on Lot 50 (KEY 1999).

- **Location:** 4 Steel Drums (*See* attached Table 1 in Attachment C for drum numbers and Sealand Container ID)

- **Existing Data Summary:** One sample was collected for analysis of the following parameters: RCRA Characteristics, TCLP VOCs, TCLP SVOCs, and TCLP Metals

  - See Table 8 for analytical results.

- **Additional Sampling and Analysis Proposed:** Yes

  - **Proposed Number Of Samples**: Four discrete samples composited into one sample for analysis

  - **Proposed Analytical Parameters:** TCLP VOCs, TCLP SVOCs, TCLP metals, PCBs, TOX, BTUs.

Group O – SRI Purge Water

- **Material Description:** Monitoring well purged groundwater generated during previous investigation of the western portion of the Site
- **Quantity (Volume):** Approximately 440 gallons (8 drums)
- **Origin:** The purged groundwater was produced during monitoring well development and purging/sampling undertaken as part of the 1998-1999 SRI on Lot 50. The groundwater originated in Monitoring Wells MW-16L and MW-17L (KEY 1999).
- **Location:** 8 Steel Drums (*See* attached Table 1 in Attachment C for drum numbers and Sealand Container ID)
- **Existing Data Summary:** Two samples were collected for analysis of the following parameters: RCRA Characteristics, TCLP VOCs, TCLP SVOCs, and TCLP Metals.
    - See Table 9 for analytical results.
    - **Additional Sampling and Analysis Proposed:** No – Existing data are sufficient.

Group P – SRI Drill Fluids

- **Material Description:** Drill fluids from soil boring drilling.
- **Quantity (Volume):** Approximately 110 gallons (2 drums).
- **Origin:** The drill fluids were produced during soil boring drilling during the 1998-1999 SRI conducted on Lot 50 (KEY 1999).
- **Location:** 2 Steel drums (*See* attached Table 1 in Attachment C for drum numbers and Sealand Container ID).
- **Existing Data Summary:** Two samples were collected for analysis of the following parameters: RCRA Characteristics, TCLP VOCs, TCLP SVOCs and TCLP Metals.
    - See Table 10 for analytical results.

- **Additional Sampling and Analysis Proposed:** No – Existing data are sufficient.

Group Q – Miscellaneous Fluids – Prior RI Work

- **Material Description:** Fluids that were likely produced during previous investigations
- **Quantity (Volume):** Approximately 330 gallons (6 drums)
- **Origin:** Prior to placement in the Sealand Container, these drums were located in Building No. 5 with other drums of fluids from the 1998-1999 SRI conducted on Lot 50. Based on their location, it is believed likely that these fluids were also produced during this SRI.
- **Location:** 6 PVC Drums (*See* attached Table 1 in Attachment C for drum numbers and Sealand Container ID)
- **Existing Data Summary:** No Data Currently Exist
- **Additional Sampling and Analysis Proposed:** Yes
    - **Proposed Number Of Samples**: Six discrete samples composited into one sample for analysis
    - **Proposed Analytical Parameters:** Total VOCs, Total SVOCs, Total metals, RCRA Characteristics, BTU, TOX and ammonia.

Group R - SRI PPE

- **Material Description:** Used Personal Protective Clothing
- **Quantity (Volume):** Less than 1 cubic yard (3 drums).
- **Origin:** PPE used during the 1998-1999 SRI completed on Lot 50 (KEY 1999).
- **Location:** 3 Steel drums (*See* attached Table 1 in Attachment C for drum numbers and Sealand Container ID).
- **Existing Data Summary:** One sample was collected for analysis of the following parameters: RCRA Characteristics, TCLP VOCs, TCLP SVOCs and TCLP Metals
    - See Table 11 for analytical results.

- **Additional Sampling and Analysis Proposed:** No – Existing data are sufficient.

Group S – Empty Crushed Drum

- **Material Description:** Empty and Crushed Steel Drum
- **Quantity (Volume):** Empty
- **Origin:** Unknown
- **Location:** 1 Steel Drum (*See* attached Table 1 in Attachment C for drum numbers and Sealand Container ID)
- **Existing Data Summary:** No Data Exist
- **Additional Sampling and Analysis Proposed:** No – Confirm that the drum is empty.

Section 3.0

3.0 SAMPLING PLAN AND METHODOLOGIES

A summary of the proposed sampling and analysis program is provided as Table 12. The sampling methodologies and data analyses are discussed in the following sections. Because the chemicals used on-Site are known and a comprehensive inventory has been completed, the potential chemical material and safety/handling concerns are known. As such, appropriate safety and sampling procedures in accordance with the Site-specific HASP will be followed during the sampling event.

3.1 SAMPLING PLAN IMPLEMENTATION

The preparation for the sampling program and sampling procedures are outlined below:

3.1.1 Preparation

Personnel retained to perform the sampling event will have appropriate training including: OSHA 40-hr HAZWOPER training, lab pack training, DOT training, and ACM AHERA training. A site-specific Health and Safety Plan has been prepared as part of the IRAW and will be followed during the sampling event. Sampling personnel will don appropriate personal protective equipment depending on the drums that are being sampled. Drum screening equipment will include a photoionization detector (PID), and a four gas meter for measuring oxygen concentration, lower explosive limits, hydrogen sulfide, and carbon monoxide.

During dry weather, the drums will be removed from the Sealand containers and inspected for signs of damage. While removing the drums from the Sealand containers, the existing drum numbering and labeling will allow for agglomeration of the drums in groups of similar materials for storage and sampling (e.g., ACM drums will be stored together).

3.1.2 Sample Collection

Prior to opening the drums, the drums will be attached to a ground wire prior to opening to discharge any static charge. Following acceptable visual inspection, trained personnel will open the drum, field screen the contents using the PID and four gas meter, and then visually inspect the contents. Sampling personnel will visually assess the material to verify the drums contents are accurately described by evaluating specific information such as: solids type, estimated percent solids, liquid type, PPE, drill cuttings, trash, investigatory derived waste, product, and suspected ACM. Personnel will group similar drums of known contents to ease in storage and handling.

The proposed sampling frequencies and parameters for analysis of the individual material types are identified in Section 2.4. Where additional characterization samples are

required, samples will be collected from similar containers based upon the drum quantities/volumes. Due to the relatively small volumes of the individual materials, sampling personnel will collect discrete samples from similar materials which will be composited at the analytical laboratory (e.g., 4 to 6 discrete samples per one lab composited sample). Sample collection equipment and/or methods will be dependent upon the type of material. Potentially applicable methods and equipment include sludge judge, Coliwasa, bailer, grab, chip sample, stainless steel trowel, and grab method using new and dedicated gloves. The total number of each drum type will be counted and randomly sampled at the frequency proposed in Section 2.4. From each drum that is proposed for a discrete sample, a positive bias (e.g., most likely impacted material) will be used for material sampling.

Sampling personnel will prepare drum log sheets with the inspection information. A photograph of each drum with drum number displayed will be taken for future reference during disposal. The samples will be shipped under chain-of-custody via overnight express or by courier and transported to a NJ-certified analytical laboratory (TestAmerica Lab) for analyses.

In accordance with the waste classification guidance and by using NJ Office of Quality Assurance certified laboratories, the following minimum quality assurance and quality control (QA/QC) procedures will be implemented:

1) Sampling will be completed in accordance with the applicable sections of the NJDEP 2005 Field Sampling Procedures Manual and as identified herein;
2) Chain of custody procedures will be followed;
3) The lab name, address, and certification number will be provided with the analytical report;
4) A quality assurance summary including any analytical non-conformance will be provided;
5) Lab chronicles and reporting dates will be provided; and,
6) Batch spike and batch spike duplicates will be presented in the laboratory reports and evaluated.

3.2 DATA EVALUATION

Upon receipt of the analytical data, concentration data for the materials will be compared to potentially applicable regulatory levels including RCRA characteristics. The analytical results will also be evaluated for compliance with the analytical QA/QC requirements listed above. Based upon the analyses and material history, a Waste Classification Request Form will be prepared and submitted to the NJDEP Waste Classification Bureau for review.

While this request is being reviewed, preparation of the waste profiles for disposal of the materials will be initiated. Following receipt of the Waste Classification Bureau's determination, the waste profiles along with the NJDEP determination will be provided to the selected treatment storage or disposal facilities to verify permit limits and for other disposal acceptance considerations.

Once the waste profiles are approved, waste manifests for transport and disposal of the materials will be prepared. Trained personnel will load the drums on trucks licensed to transport the materials. The trucking company will transport all RCRA hazardous or TSCA regulated waste to the appropriate permitted TSDF for disposal/treatment.

The Sealand containers currently storing the drums will be decontaminated. The decontamination materials will be sampled for RCRA characterization and the material will be disposed pending the results of the analytical results. Expecting that the volume of decontamination fluids is less than 20 cy, or approximately 4,000 gallons, one (1) composite sample of up to 5-discrete drums will be collected from decontamination materials and analyzed for the full RCRA characteristics list, TCLP metals, TCLP VOCs, TCLP SVOCs, PCBs, TOX, oil and grease and solids content. The decontamination fluids will be subsequently transported to and disposed at a licensed TSDF after profile preparation and permit verification.

Tables

TABLES

TABLE 1
WASTE CHARACTERIZATION ANALYTICAL RESULTS - ASBESTOS CONTAINING MATERIALS
STANDARD CHLORINE CHEMICAL CO., INC. SITE
KEARNY, NEW JERSEY

ESTIMATED QUANTITY	**362** **Drums ACM (Approx.)** **8** **Bags**	

			Description	ACM	ACM	ACM	ACM	ACM	ACM	ACM	ACM	ACM	ACM	ACM/ COMPOSITE	ACM/ COMPOSITE
			Sample Name	**DR-1**	**DR-2**	**DR-3**	**DR-4**	**Comp 1**	**SCC-AUI-1**	**SCC-AUI-2**	**SCC-AUI-5**	**SCC-AUI-6**	**SCC-AUI-7**	**SCC-A-1/ SCC-A-2**	**SCC-A-3/ SCC-A-4**
			Sample Date	7/13/2000	7/13/2000	7/13/2000	7/13/2000	7/13/2000	7/21/1987	7/21/1987	7/21/1987	7/21/1987	7/21/1987	1/6/1988	1/6/1988
			Dates Reported (Approx.)												
PARAMETER	**UNITS**	**RCRA LIMITS**													
RCRA CHARACTERISTICS															
Flashpoint	Degrees F	<140						No (Composite)							
Corrosivity	pH (S.U.)	<2, >12.5						8.14 (Composite)							
Reactive Sulfide	ppm	(1)						ND (Composite)							
Reactive Cyanide	ppm	(1)						ND (Composite)							
Dioxins/Furans															
Total TCDF	ppb (ug/kg)													62	123
2,3,7,8-TCDF	ppb (ug/kg)			0.0523	0.815	0.238	1.28								
1,2,3,7,8-PeCDF	ppb (ug/kg)			0.0611	1.38	0.604	1.34								
2,3,4,7,8-PeCDF	ppb (ug/kg)			0.411	12.4	5.8	14.5								
Total PeCDF	ppb (ug/kg)													17	122
1,2,3,4,7,8-HxCDF	ppb (ug/kg)			1.67	59.2	23.2	35.9								
1,2,3,6,7,8-HxCDF	ppb (ug/kg)			0.258	9.32	3.55	5.8								
2,3,4,6,7,8-HxCDF	ppb (ug/kg)			0.13	4.33	1.87	2.85								
1,2,3,7,8,9-HxCDF	ppb (ug/kg)			0.08	2.33	1.06	1.8								
Total HxCDF	ppb (ug/kg)													30.3	171
1,2,3,4,6,7,8-HpCDF	ppb (ug/kg)			4.73	83.2	49.6	75.3								
1,2,3,4,7,8,9-HpCDF	ppb (ug/kg)			0.186	2.37	1.69	2.33								
Total HpCDF	ppb (ug/kg)													63.6	401
Total OCDF	ppb (ug/kg)			8.72	400	142	255							99.8	538
2,3,7,8-TCDD	ppb (ug/kg)			0.0108	0.19	0.0688	0.258								
Total TCDD	ppb (ug/kg)													29.5	37.6
1,2,3,7,8-PeCDD	ppb (ug/kg)			0.046	0.526	0.428	1.1								
Total PCDD	ppb (ug/kg)													2.2	4.8
1,2,3,4,7,8-HxCDD	ppb (ug/kg)			0.0232	0.281	0.279	0.696								
1,2,3,6,7,8-HxCDD	ppb (ug/kg)			0.0713	1.05	0.936	2.29								
1,2,3,7,8,9-HxCDD	ppb (ug/kg)			0.0269	0.366	0.346	0.843								
Total HxCDD	ppb (ug/kg)													1.6	14.4
1,2,3,4,6,7,8-HpCDD	ppb (ug/kg)			0.229	4.13	2.25	5.88								
Total HpCDD	ppb (ug/kg)													5.3	13.7
Total OCDD	ppb (ug/kg)			2.46	31.9	13.1	31.5							35.9	64.7
Total Metals															
Chromium, Total	mg/kg								128	3670	166	3110	746		
Hexavalent Chromium	mg/kg								12	11	2.7	15	23		
Total VOCs															
Acetone	ug/kg			<89	<84	<76	<98								
Acrolein	ug/kg			<180	<170	<150	<200								
Acrylonitrile	ug/kg			<180	<170	<150	<200								
Benzene	ug/kg			<8.9	<8.4	<7.6	<9.8								
Bromobenzene	ug/kg			<8.9	<8.4	<7.6	<9.8								
Bromochloromethane	ug/kg			<8.9	<8.4	<7.6	<9.8								
Bromodichloromethane	ug/kg			<8.9	<8.4	<7.6	<9.8								

TABLE 1
WASTE CHARACTERIZATION ANALYTICAL RESULTS - ASBESTOS CONTAINING MATERIALS
STANDARD CHLORINE CHEMICAL CO., INC. SITE
KEARNY, NEW JERSEY

ESTIMATED QUANTITY	362 Drums ACM (Approx.) 8 Bags

			Description	ACM	ACM	ACM	ACM	ACM	ACM	ACM	ACM	ACM	ACM	ACM/ COMPOSITE	ACM/ COMPOSITE
			Sample Name	DR-1	DR-2	DR-3	DR-4	Comp 1	SCC-AUI-1	SCC-AUI-2	SCC-AUI-5	SCC-AUI-6	SCC-AUI-7	SCC-A-1/ SCC-A-2	SCC-A-3/ SCC-A-4
			Sample Date	7/13/2000	7/13/2000	7/13/2000	7/13/2000	7/13/2000	7/21/1987	7/21/1987	7/21/1987	7/21/1987	7/21/1987	1/6/1988	1/6/1988
			Dates Reported (Approx.)												
PARAMETER	**UNITS**	**RCRA LIMITS**													
Bromoform	ug/kg			<8.9	<8.4	<7.6	<9.8								
Total VOCs (Continued)															
Bromomethane	ug/kg			<8.9	<8.4	<7.6	<9.8								
2-Butanone	ug/kg			<45	<42	<38	<49								
n-Butylbenzene	ug/kg			<8.9	<8.4	<7.6	<9.8								
sec-Butylbenzene	ug/kg			<8.9	<8.4	<7.6	<9.8								
tert-Butylbenzene	ug/kg			<8.9	<8.4	<7.6	<9.8								
Carbon disulfide	ug/kg			<8.9	<8.4	<7.6	<9.8								
Carbon tetrachloride	ug/kg			<8.9	<8.4	<7.6	<9.8								
Chlorobenzene	ug/kg			<8.9	<8.4	<7.6	<9.8								
Chloroethane	ug/kg			<8.9	<8.4	<7.6	<9.8								
2-Chlroethyl vinyl ether	ug/kg			<8.9	<8.4	<7.6	<9.8								
Chloroform	ug/kg			<8.9	<8.4	<7.6	<9.8								
Chloromethane	ug/kg			<8.9	<8.4	<7.6	<9.8								
2-Chlorotoluene	ug/kg			<8.9	<8.4	<7.6	<9.8								
4-Chlorotoluene	ug/kg			<8.9	<8.4	<7.6	<9.8								
Dibromochloromethane	ug/kg			<8.9	<8.4	<7.6	<9.8								
1,2-Dibromo-3-chloropropane	ug/kg			<8.9	<8.4	<7.6	<9.8								
Dibromomethane	ug/kg			<8.9	<8.4	<7.6	<9.8								
1,2-Dibromomethane (EDB)	ug/kg			<8.9	<8.4	<7.6	<9.8								
1,2-Dichlorobenzene	ug/kg			<8.9	<8.4	<7.6	<9.8								
1,3-Dichlorobenzene	ug/kg			<8.9	<8.4	<7.6	<9.8								
1,4-Dichlorobenzene	ug/kg			<8.9	<8.4	<7.6	<9.8								
trans-1,4-Dichloro-2-butene	ug/kg			<8.9	<8.4	<7.6	<9.8								
1,1-Dichloroethane	ug/kg			<8.9	<8.4	<7.6	<9.8								
1,1-Dichloroethene	ug/kg			<8.9	<8.4	<7.6	<9.8								
1,2-Dichloroethane	ug/kg			<8.9	<8.4	<7.6	<9.8								
cis-1,2-Dichloroethene	ug/kg			<8.9	<8.4	<7.6	<9.8								
trans-1,2-Dichloroethene	ug/kg			<8.9	<8.4	<7.6	<9.8								
1,2-Dichloropropane	ug/kg			<8.9	<8.4	<7.6	<9.8								
1,3-Dichloropropane	ug/kg			<8.9	<8.4	<7.6	<9.8								
2,2-Dichloropropane	ug/kg			<8.9	<8.4	<7.6	<9.8								
1,1-Dichloropropene	ug/kg			<8.9	<8.4	<7.6	<9.8								
cis-1,3-Dichloropropene	ug/kg			<8.9	<8.4	<7.6	<9.8								
trans-1,3-Dichloropropene	ug/kg			<8.9	<8.4	<7.6	<9.8								
Dichlorodifluoromethane	ug/kg			<8.9	<8.4	<7.6	<9.8								
Diisopropyl ether (DIPE)	ug/kg			<8.9	<8.4	<7.6	<9.8								
Ethylbenzene	ug/kg			<8.9	<8.4	<7.6	<9.8								
Hexachlorobutadiene	ug/kg			<8.9	<8.4	<7.6	<9.8								
2-Hexanone	ug/kg			<8.9	<8.4	<7.6	<9.8								
Iodomethane	ug/kg			<8.9	<8.4	<7.6	<9.8								
Isopropylbenzene	ug/kg			<8.9	<8.4	<7.6	<9.8								
4-Isopropyltoluene	ug/kg			<8.9	<8.4	<7.6	<9.8								
Methylene chloride	ug/kg			<36	<34	<30	<39								
4-Methyl-tert-butyl ether (MTBE)	ug/kg			<8.9	<8.4	<7.6	<9.8								

TABLE 1
WASTE CHARACTERIZATION ANALYTICAL RESULTS - ASBESTOS CONTAINING MATERIALS
STANDARD CHLORINE CHEMICAL CO., INC. SITE
KEARNY, NEW JERSEY

ESTIMATED QUANTITY	362 Drums ACM (Approx.) 8 Bags

			Description	ACM	ACM	ACM	ACM	ACM	ACM	ACM	ACM	ACM	ACM	ACM/ COMPOSITE	ACM/ COMPOSITE
			Sample Name	DR-1	DR-2	DR-3	DR-4	Comp 1	SCC-AUI-1	SCC-AUI-2	SCC-AUI-5	SCC-AUI-6	SCC-AUI-7	SCC-A-1/ SCC-A-2	SCC-A-3/ SCC-A-4
			Sample Date	7/13/2000	7/13/2000	7/13/2000	7/13/2000	7/13/2000	7/21/1987	7/21/1987	7/21/1987	7/21/1987	7/21/1987	1/6/1988	1/6/1988
			Dates Reported (Approx.)												
PARAMETER	**UNITS**	**RCRA LIMITS**													
Naphthalene	ug/kg			<8.9	<8.4	<7.6	<9.8								
n-Propyl benzene	ug/kg			<8.9	<8.4	<7.6	<9.8								
Total VOCs (Continued)															
Styrene	ug/kg			<8.9	<8.4	<7.6	<9.8								
1,1,1,2-Tetrachloroethane	ug/kg			<8.9	<8.4	<7.6	<9.8								
1,1,2,2-Tetrachloroethane	ug/kg			<8.9	<8.4	<7.6	<9.8								
Tetrachloroethene	ug/kg			<8.9	<8.4	<7.6	<9.8								
Toluene	ug/kg			<8.9	<8.4	<7.6	<9.8								
1,2,3-Trichlorobenzene	ug/kg			<8.9	<8.4	<7.6	<9.8								
1,2,4-Trichlorobenzene	ug/kg			<8.9	<8.4	<7.6	<9.8								
Trichloroethene	ug/kg			<8.9	<8.4	<7.6	<9.8								
1,1,1-Trichloroethane	ug/kg			<8.9	<8.4	<7.6	<9.8								
1,1,2-Trichloroethane	ug/kg			<8.9	<8.4	<7.6	<9.8								
Trichlorofluoromethane	ug/kg			<8.9	<8.4	<7.6	<9.8								
1,2,3-trichloropropane	ug/kg			<8.9	<8.4	<7.6	<9.8								
1,2,4-Trimethylbenzene	ug/kg			<8.9	<8.4	<7.6	<9.8								
1,3,5-Trimethylbenzene	ug/kg			<8.9	<8.4	<7.6	<9.8								
Vinyl chloride	ug/kg			<8.9	<8.4	<7.6	<9.8								
m-,p-Xylene	ug/kg			<18	<17	<15	<20								
o-Xylene	ug/kg			<8.9	<8.4	<7.6	<9.8								
Total SVOCs															
1,2-Dichlorobenzene	mg/kg								<4.0	<10 (2)	ND (3)	210	<10		
1,3-Dichlorobenzene	mg/kg								<4.0	<10.0	ND	49	<10		
1,4-Dichlorobenzene	mg/kg								<4.0	<10.0	ND	90	<10		
1,2,3-Trichlorobenzene	mg/kg								170	2100	ND	1500	290.0		
1,2,4-Trichlorobenzene	mg/kg								<4.0	14	ND	3200	180.0		
1,2,4,5-Tetrachlorobenzene	mg/kg								ND	14	ND	270	200.0		
1,2,3,4-Tetrachlorobenzene	mg/kg								ND	<10.0	ND	350	820.0		
Hexachlorobenzene	mg/kg								ND	ND	ND	<10.0	48		
Pentachlorobenzene	mg/kg								ND	<10.0	ND	30	310		
Naphthalene	mg/kg								6000	860	5.4	1200	<10		

Notes:
1. Reactivity criteria are specified in 40CFR Part 261.23
2. For Total SVOCs, for <#.#, the constituent was detected, but less than the detection limit.
3. The ND indicates that the constituent was not detected.

TABLE 2
WASTE CHARACTERIZATION ANALYTICAL RESULTS - RESIDUAL CONTENTS - AST NOS. 9 AND 13
STANDARD CHLORINE CHEMICAL CO., INC. SITE
KEARNY, NEW JERSEY

ESTIMATED DRUM COUNT			**16**	**31**
		Waste Type/Description	Tank 9 Contents	Tank 13 Contents
		Sample Name	**C-9 Tank Rust, TB-C9**	**C-13 Tank Rust, TB-C13**
		Dates Reported (Approx.)	9/29/1987, 9/23/00	9/29/1987, 9/23/00
PARAMETER	**UNITS**	**RCRA LIMITS**		
RCRA CHARACTERISTICS				
Flashpoint	Degrees F	<140	>200	>200
Corrosivity	pH (S.U.)	<2, >12.5	9.21	10.38
Reactive Sulfide	ppm	(1)	<0.25	<0.30
Reactive Cyanide	ppm	(1)	<49.7	<59.2
Solids	%		80.4	67.5
TCLP Metals				
Arsenic (As)	mg/L	5.0	<1.00	<1.00
Barium (Ba)	mg/L	100.0	<0.500	<0.500
Cadmium (Cd)	mg/L	1.0	<0.100	<0.100
Chromium (Cr)	mg/L	5.0	4.380	<0.100
Lead (Pb)	mg/L	5.0	<0.500	<0.500
Mercury (Hg)	mg/L	0.2	<0.002	<0.002
Selenium (Se)	mg/L	1.0	<0.500	<0.500
Silver (Ag)	mg/L	5.0	<0.100	<0.100
TCLP VOCs				
Benzene	mg/l	0.5	<0.050	<0.050
2-Butanone (MEK)	mg/l	200.0	<0.100	<0.100
Carbon tetrachloride	mg/l	0.5	<0.050	<0.050
Chlorobenzene	mg/l	100.0	<0.050	0.234
Chloroform	mg/l	6.0	<0.050	<0.050
1,1-Dichloroethene	mg/l	0.7	<0.050	<0.050
1,2-Dichloroethane	mg/l	0.5	<0.050	<0.050
Tetrachloroethene	mg/l	0.7	<0.050	<0.050
Trichloroethylene	mg/l	0.5	<0.050	<0.050
Vinyl Chloride	mg/l	0.2	<0.100	<0.100
TCLP SVOCs				
Pyridine	mg/l	5.0	<0.10	<0.10
1,4-Dichlorobenzene	mg/l	7.5	<0.10	<0.10
2-Methylphenol	mg/l	200.0	<0.10	<0.10
3&4-Methylphenol	mg/l	200.0	<0.10	<0.10
Hexachloroethane	mg/l	3.0	<0.10	<0.10
Nitrobenzene	mg/l	2.0	<0.10	<0.10
Hexachlorobutadiene	mg/l	0.5	<0.10	<0.10
2,4,6-Trichlorophenol	mg/l	2.0	<0.10	0.33
2,4,5-Trichlorophenol	mg/l	400.0	<0.50	<0.50
2,4-Dinitrotoluene	mg/l	0.13	<0.10	<0.10
Hexachlorobenzene	mg/l	0.13	<0.10	<0.10
Pentachlorophenol	mg/l	100.0	<0.10	<0.10

TABLE 2
WASTE CHARACTERIZATION ANALYTICAL RESULTS - RESIDUAL CONTENTS - AST NOS. 9 AND 13 STANDARD CHLORINE CHEMICAL CO., INC. SITE KEARNY, NEW JERSEY

ESTIMATED DRUM COUNT			16	31
		Waste Type/Description	Tank 9 Contents	Tank 13 Contents
		Sample Name	C-9 Tank Rust, TB-C9	C-13 Tank Rust, TB-C13
		Dates Reported (Approx.)	9/29/1987, 9/23/00	9/29/1987, 9/23/00
PARAMETER	**UNITS**	**RCRA LIMITS**		
PCBs*				
Mono Homologs (Total)	ppm (mg/kg)		<0.0010	3.3
Di Homologs (Total)	ppm (mg/kg)		<0.019	11.0
Tri Homologs (Total)	ppm (mg/kg)		0.079	14.5
Tetra Homologs (Total)	ppm (mg/kg)		0.14	10.6
Penta Homologs (Total)	ppm (mg/kg)		0.0090	2.6
Hexa Homologs (Total)	ppm (mg/kg)		0.059	0.58
Hepta Homologs (Total)	ppm (mg/kg)		<0.00070	0.10
Octa Homologs (Total)	ppm (mg/kg)		<0.00090	<0.0090
Nona Homologs (Total)	ppm (mg/kg)		<0.0080	<0.012
Deca Homologs (Total)	ppm (mg/kg)		<0.012	0.010
Total (ND=0 ppm)	ppm (mg/kg)		0.287	42.69
Dioxins/Furans				
TCDF- Total Tetra Furans	ppt (ng/kg)		<100	257,000
2,3,7,8-TCDF	ppt (ng/kg)		<130	9,000
1,2,3,7,8-PeCDF	ppt (ng/kg)			
2,3,4,7,8-PeCDF	ppt (ng/kg)			
1,2,3,4,7,8-HxCDF	ppt (ng/kg)			
1,2,3,6,7,8-HxCDF	ppt (ng/kg)			
2,3,4,6,7,8-HxCDF	ppt (ng/kg)			
1,2,3,7,8,9-HxCDF	ppt (ng/kg)			
1,2,3,4,6,7,8-HpCDF	ppt (ng/kg)			
1,2,3,4,7,8,9-HpCDF	ppt (ng/kg)			
Total PeCDF	ppt (ng/kg)			
Total HxCDF	ppt (ng/kg)			
Total HpCDF	ppt (ng/kg)			
Total OCDF	ppt (ng/kg)			
TCDD - Total Tetra Dioxins	ppt (ng/kg)		2,800	3,110,000
2,3,7,8-TCDD	ppt (ng/kg)		<130	<550
1,2,3,7,8-PeCDD	ppt (ng/kg)			
1,2,3,4,7,8-HcCDD	ppt (ng/kg)			
1,2,3,6,7,8-HcCDD	ppt (ng/kg)			
1,2,3,7,8,9-HxCDD	ppt (ng/kg)			
1,2,3,4,6,7,8-HpCDD	ppt (ng/kg)			
Total PeCDD	ppt (ng/kg)			
Total HxCDD	ppt (ng/kg)			
Total HpCDD	ppt (ng/kg)			
Total OCDD	ppt (ng/kg)			

Notes:
1. Reactivity criteria are specified in 40CFR Part 261.23
2. The ND indicates that the constituent was not detected.

TABLE 3
WASTE CHARACTERIZATION ANALYTICAL RESULTS - RESIDUAL CONTENTS - AST NO. 10
STANDARD CHLORINE CHEMICAL CO., INC. SITE
KEARNY, NEW JERSEY

ESTIMATED DRUM COUNT			**13**
		Waste Type/Description	Tank 10 Contents
		Sample Name	**C-10 Tank Contents, TB-C1(**
		Dates Reported (Approx.)	9/29/1987, 9/23/00
PARAMETER	**UNITS**	**RCRA LIMITS**	
RCRA CHARACTERISTICS			
Flashpoint	Degrees F	<140	>200
Corrosivity	pH (S.U.)	<2, >12.5	4.14
Reactive Sulfide	ppm	(1)	<0.26
Reactive Cyanide	ppm	(1)	<52.3
Solids	%		76.5
TCLP Metals			
Arsenic (As)	mg/L	5.0	<1.00
Barium (Ba)	mg/L	100.0	<0.500
Cadmium (Cd)	mg/L	1.0	<0.100
Chromium (Cr)	mg/L	5.0	<0.100
Lead (Pb)	mg/L	5.0	<0.500
Mercury (Hg)	mg/L	0.2	<0.002
Selenium (Se)	mg/L	1.0	<0.500
Silver (Ag)	mg/L	5.0	<0.100
TCLP VOCs			
Benzene	mg/l	0.5	<0.050
2-Butanone (MEK)	mg/l	200.0	<0.100
Carbon tetrachloride	mg/l	0.5	<0.050
Chlorobenzene	mg/l	100.0	<0.050
Chloroform	mg/l	6.0	<0.050
1,1-Dichloroethene	mg/l	0.7	<0.050
1,2-Dichloroethane	mg/l	0.5	<0.050
Tetrachloroethene	mg/l	0.7	<0.050
Trichloroethylene	mg/l	0.5	<0.050
Vinyl Chloride	mg/l	0.2	<0.100
TCLP SVOCs			
Pyridine	mg/l	5.0	<0.10
1,4-Dichlorobenzene	mg/l	7.5	<0.10
2-Methylphenol	mg/l	200.0	<0.10
3&4-Methylphenol	mg/l	200.0	<0.10
Hexachloroethane	mg/l	3.0	<0.10
Nitrobenzene	mg/l	2.0	<0.10
Hexachlorobutadiene	mg/l	0.5	<0.10
2,4,6-Trichlorophenol	mg/l	2.0	<0.10
2,4,5-Trichlorophenol	mg/l	400.0	<0.50
2,4-Dinitrotoluene	mg/l	0.13	<0.10
Hexachlorobenzene	mg/l	0.13	<0.10
Pentachlorophenol	mg/l	100.0	<0.10

TABLE 3
WASTE CHARACTERIZATION ANALYTICAL RESULTS - RESIDUAL CONTENTS - AST NO. 10
STANDARD CHLORINE CHEMICAL CO., INC. SITE
KEARNY, NEW JERSEY

		ESTIMATED DRUM COUNT	13
		Waste Type/Description	Tank 10 Contents
		Sample Name	**C-10 Tank Contents, TB-C1(**
		Dates Reported (Approx.)	9/29/1987, 9/23/00
PARAMETER	**UNITS**	**RCRA LIMITS**	
PCBs*			
Mono Homologs (Total)	ppm (mg/kg)		<1.4
Di Homologs (Total)	ppm (mg/kg)		170
Tri Homologs (Total)	ppm (mg/kg)		577
Tetra Homologs (Total)	ppm (mg/kg)		375
Penta Homologs (Total)	ppm (mg/kg)		46.7
Hexa Homologs (Total)	ppm (mg/kg)		7.8
Hepta Homologs (Total)	ppm (mg/kg)		1.3
Octa Homologs (Total)	ppm (mg/kg)		0.16
Nona Homologs (Total)	ppm (mg/kg)		0.14
Deca Homologs (Total)	ppm (mg/kg)		0.14
Total (ND=0 ppm)	ppm (mg/kg)		1178.24
Dioxins/Furans			
TCDF- Total Tetra Furans	ppt (ng/kg)		165,000
2,3,7,8-TCDF	ppt (ng/kg)		2,200
1,2,3,7,8-PeCDF	ppt (ng/kg)		
2,3,4,7,8-PeCDF	ppt (ng/kg)		
1,2,3,4,7,8-HxCDF	ppt (ng/kg)		
1,2,3,6,7,8-HxCDF	ppt (ng/kg)		
2,3,4,6,7,8-HxCDF	ppt (ng/kg)		
1,2,3,7,8,9-HxCDF	ppt (ng/kg)		
1,2,3,4,6,7,8-HpCDF	ppt (ng/kg)		
1,2,3,4,7,8,9-HpCDF	ppt (ng/kg)		
Total PeCDF	ppt (ng/kg)		
Total HxCDF	ppt (ng/kg)		
Total HpCDF	ppt (ng/kg)		
Total OCDF	ppt (ng/kg)		
TCDD - Total Tetra Dioxins	ppt (ng/kg)		940,000
2,3,7,8-TCDD	ppt (ng/kg)		<420
1,2,3,7,8-PeCDD	ppt (ng/kg)		
1,2,3,4,7,8-HcCDD	ppt (ng/kg)		
1,2,3,6,7,8-HcCDD	ppt (ng/kg)		
1,2,3,7,8,9-HxCDD	ppt (ng/kg)		
1,2,3,4,6,7,8-HpCDD	ppt (ng/kg)		
Total PeCDD	ppt (ng/kg)		
Total HxCDD	ppt (ng/kg)		
Total HpCDD	ppt (ng/kg)		
Total OCDD	ppt (ng/kg)		

Notes:

1. Reactivity criteria are specified in 40CFR Part 261.23
2. The ND indicates that the constituent was not detected.

TABLE 4
WASTE CHARACTERIZATION ANALYTICAL RESULTS - RESIDUAL CONTENTS - AST NO. 11
STANDARD CHLORINE CHEMICAL CO., INC. SITE
KEARNY, NEW JERSEY

ESTIMATED DRUM COUNT			**25**
		Waste Type/Description	Tank 11 Contents
		Sample Name	**C-11 Tank Contents, TB-C11**
		Dates Reported (Approx.)	9/29/1987, 9/23/00
PARAMETER	**UNITS**	**RCRA LIMITS**	
RCRA CHARACTERISTICS			
Flashpoint	Degrees F	<140	>200
Corrosivity	pH (S.U.)	<2, >12.5	8.61
Reactive Sulfide	ppm	(1)	<0.30
Reactive Cyanide	ppm	(1)	<59.6
Solids	%		67.1
TCLP Metals			
Arsenic (As)	mg/L	5.0	<1.00
Barium (Ba)	mg/L	100.0	<0.500
Cadmium (Cd)	mg/L	1.0	<0.100
Chromium (Cr)	mg/L	5.0	<0.100
Lead (Pb)	mg/L	5.0	<0.500
Mercury (Hg)	mg/L	0.2	<0.002
Selenium (Se)	mg/L	1.0	<0.500
Silver (Ag)	mg/L	5.0	<0.100
TCLP VOCs			
Benzene	mg/l	0.5	<0.050
2-Butanone (MEK)	mg/l	200.0	<0.100
Carbon tetrachloride	mg/l	0.5	<0.050
Chlorobenzene	mg/l	100.0	<0.050
Chloroform	mg/l	6.0	<0.050
1,1-Dichloroethene	mg/l	0.7	<0.050
1,2-Dichloroethane	mg/l	0.5	<0.050
Tetrachloroethene	mg/l	0.7	<0.050
Trichloroethylene	mg/l	0.5	<0.050
Vinyl Chloride	mg/l	0.2	<0.100
TCLP SVOCs			
Pyridine	mg/l	5.0	<0.10
1,4-Dichlorobenzene	mg/l	7.5	<0.10
2-Methylphenol	mg/l	200.0	<0.10
3&4-Methylphenol	mg/l	200.0	<0.10
Hexachloroethane	mg/l	3.0	<0.10
Nitrobenzene	mg/l	2.0	<0.10
Hexachlorobutadiene	mg/l	0.5	<0.10
2,4,6-Trichlorophenol	mg/l	2.0	<0.10
2,4,5-Trichlorophenol	mg/l	400.0	<0.50
2,4-Dinitrotoluene	mg/l	0.13	<0.10
Hexachlorobenzene	mg/l	0.13	<0.10
Pentachlorophenol	mg/l	100.0	<0.10

TABLE 4
WASTE CHARACTERIZATION ANALYTICAL RESULTS - RESIDUAL CONTENTS - AST NO. 11
STANDARD CHLORINE CHEMICAL CO., INC. SITE
KEARNY, NEW JERSEY

ESTIMATED DRUM COUNT			**25**
		Waste Type/Description	Tank 11 Contents
		Sample Name	**C-11 Tank Contents, TB-C11**
		Dates Reported (Approx.)	9/29/1987, 9/23/00
PARAMETER	**UNITS**	**RCRA LIMITS**	
PCBs*			
Mono Homologs (Total)	ppm (mg/kg)		54.8
Di Homologs (Total)	ppm (mg/kg)		83.2
Tri Homologs (Total)	ppm (mg/kg)		387
Tetra Homologs (Total)	ppm (mg/kg)		162
Penta Homologs (Total)	ppm (mg/kg)		35.8
Hexa Homologs (Total)	ppm (mg/kg)		6
Hepta Homologs (Total)	ppm (mg/kg)		0.52
Octa Homologs (Total)	ppm (mg/kg)		<0.062
Nona Homologs (Total)	ppm (mg/kg)		0.18
Deca Homologs (Total)	ppm (mg/kg)		0.29
Total (ND=0 ppm)	ppm (mg/kg)		729.79
Dioxins/Furans			
TCDF- Total Tetra Furans	ppt (ng/kg)		388,000
2,3,7,8-TCDF	ppt (ng/kg)		5,300
1,2,3,7,8-PeCDF	ppt (ng/kg)		
2,3,4,7,8-PeCDF	ppt (ng/kg)		
1,2,3,4,7,8-HxCDF	ppt (ng/kg)		
1,2,3,6,7,8-HxCDF	ppt (ng/kg)		
2,3,4,6,7,8-HxCDF	ppt (ng/kg)		
1,2,3,7,8,9-HxCDF	ppt (ng/kg)		
1,2,3,4,6,7,8-HpCDF	ppt (ng/kg)		
1,2,3,4,7,8,9-HpCDF	ppt (ng/kg)		
Total PeCDF	ppt (ng/kg)		
Total HxCDF	ppt (ng/kg)		
Total HpCDF	ppt (ng/kg)		
Total OCDF	ppt (ng/kg)		
TCDD - Total Tetra Dioxins	ppt (ng/kg)		5,200,000
2,3,7,8-TCDD	ppt (ng/kg)		<270
1,2,3,7,8-PeCDD	ppt (ng/kg)		
1,2,3,4,7,8-HcCDD	ppt (ng/kg)		
1,2,3,6,7,8-HcCDD	ppt (ng/kg)		
1,2,3,7,8,9-HxCDD	ppt (ng/kg)		
1,2,3,4,6,7,8-HpCDD	ppt (ng/kg)		
Total PeCDD	ppt (ng/kg)		
Total HxCDD	ppt (ng/kg)		
Total HpCDD	ppt (ng/kg)		
Total OCDD	ppt (ng/kg)		

Notes:

1. Reactivity criteria are specified in 40CFR Part 261.23
2. The ND indicates that the constituent was not detected.

TABLE 5
WASTE CHARACTERIZATION ANALYTICAL RESULTS - RESIDUAL CONTENTS - AST NO. 12
STANDARD CHLORINE CHEMICAL CO., INC. SITE
KEARNY, NEW JERSEY

ESTIMATED DRUM COUNT			**17**
Waste Type/Description			Tank 12 Contents
Sample Name			**C-12 Tank Sludge, TB-C12**
Dates Reported (Approx.)			9/29/1987, 9/23/00
PARAMETER	**UNITS**	**RCRA LIMITS**	
RCRA CHARACTERISTICS			
Flashpoint	Degrees F	<140	140
Corrosivity	pH (S.U.)	<2, >12.5	11.44
Reactive Sulfide	ppm	(1)	<0.31
Reactive Cyanide	ppm	(1)	<62.0
Solids	%		64.5
TCLP Metals			
Arsenic (As)	mg/L	5.0	<1.00
Barium (Ba)	mg/L	100.0	<0.500
Cadmium (Cd)	mg/L	1.0	<0.100
Chromium (Cr)	mg/L	5.0	0.187
Lead (Pb)	mg/L	5.0	<0.500
Mercury (Hg)	mg/L	0.2	<0.002
Selenium (Se)	mg/L	1.0	<0.500
Silver (Ag)	mg/L	5.0	<0.100
TCLP VOCs			
Benzene	mg/l	0.5	<0.050
2-Butanone (MEK)	mg/l	200.0	<0.100
Carbon tetrachloride	mg/l	0.5	<0.050
Chlorobenzene	mg/l	100.0	0.092
Chloroform	mg/l	6.0	<0.050
1,1-Dichloroethene	mg/l	0.7	<0.050
1,2-Dichloroethane	mg/l	0.5	<0.050
Tetrachloroethene	mg/l	0.7	<0.050
Trichloroethylene	mg/l	0.5	<0.050
Vinyl Chloride	mg/l	0.2	<0.100
TCLP SVOCs			
Pyridine	mg/l	5.0	<0.10
1,4-Dichlorobenzene	mg/l	7.5	<0.10
2-Methylphenol	mg/l	200.0	<0.10
3&4-Methylphenol	mg/l	200.0	<0.10
Hexachloroethane	mg/l	3.0	<0.10
Nitrobenzene	mg/l	2.0	<0.10
Hexachlorobutadiene	mg/l	0.5	<0.10
2,4,6-Trichlorophenol	mg/l	2.0	2.56E
2,4,5-Trichlorophenol	mg/l	400.0	0.94
2,4-Dinitrotoluene	mg/l	0.13	<0.10
Hexachlorobenzene	mg/l	0.13	<0.10
Pentachlorophenol	mg/l	100.0	0.76

TABLE 5
WASTE CHARACTERIZATION ANALYTICAL RESULTS - RESIDUAL CONTENTS - AST NO. 12
STANDARD CHLORINE CHEMICAL CO., INC. SITE
KEARNY, NEW JERSEY

ESTIMATED DRUM COUNT			17
		Waste Type/Description	Tank 12 Contents
		Sample Name	**C-12 Tank Sludge, TB-C12**
		Dates Reported (Approx.)	9/29/1987, 9/23/00
PARAMETER	**UNITS**	**RCRA LIMITS**	
PCBs*			
Mono Homologs (Total)	ppm (mg/kg)		11.8
Di Homologs (Total)	ppm (mg/kg)		20.8
Tri Homologs (Total)	ppm (mg/kg)		29.4
Tetra Homologs (Total)	ppm (mg/kg)		18.9
Penta Homologs (Total)	ppm (mg/kg)		5.6
Hexa Homologs (Total)	ppm (mg/kg)		1.1
Hepta Homologs (Total)	ppm (mg/kg)		0.24
Octa Homologs (Total)	ppm (mg/kg)		<0.016
Nona Homologs (Total)	ppm (mg/kg)		0.027
Deca Homologs (Total)	ppm (mg/kg)		0.026
Total (ND=0 ppm)	ppm (mg/kg)		87.893
Dioxins/Furans			
TCDF- Total Tetra Furans	ppt (ng/kg)		157,000
2,3,7,8-TCDF	ppt (ng/kg)		2,800
1,2,3,7,8-PeCDF	ppt (ng/kg)		
2,3,4,7,8-PeCDF	ppt (ng/kg)		
1,2,3,4,7,8-HxCDF	ppt (ng/kg)		
1,2,3,6,7,8-HxCDF	ppt (ng/kg)		
2,3,4,6,7,8-HxCDF	ppt (ng/kg)		
1,2,3,7,8,9-HxCDF	ppt (ng/kg)		
1,2,3,4,6,7,8-HpCDF	ppt (ng/kg)		
1,2,3,4,7,8,9-HpCDF	ppt (ng/kg)		
Total PeCDF	ppt (ng/kg)		
Total HxCDF	ppt (ng/kg)		
Total HpCDF	ppt (ng/kg)		
Total OCDF	ppt (ng/kg)		
TCDD - Total Tetra Dioxins	ppt (ng/kg)		1,820,000
2,3,7,8-TCDD	ppt (ng/kg)		<360
1,2,3,7,8-PeCDD	ppt (ng/kg)		
1,2,3,4,7,8-HcCDD	ppt (ng/kg)		
1,2,3,6,7,8-HcCDD	ppt (ng/kg)		
1,2,3,7,8,9-HxCDD	ppt (ng/kg)		
1,2,3,4,6,7,8-HpCDD	ppt (ng/kg)		
Total PeCDD	ppt (ng/kg)		
Total HxCDD	ppt (ng/kg)		
Total HpCDD	ppt (ng/kg)		
Total OCDD	ppt (ng/kg)		

Notes:
1. Reactivity criteria are specified in 40CFR Part 261.23
2. The ND indicates that the constituent was not detected.

TABLE 6
WASTE CHARACTERIZATION ANALYTICAL RESULTS - MACHINE OIL
STANDARD CHLORINE CHEMICAL CO., INC. SITE
KEARNY, NEW JERSEY

			Waste Type/Description	Waste Oil	Waste Oil
			Sample Name	WH-OIL-01O	WH-OIL-01S
			Sample Date	9/19/2000	9/19/2000
			Dates Reported (Approx.)	9/27/2000	9/22/2000
PARAMETER	**UNITS**	**TCLP LIMITS**			
RCRA CHARACTERISTICS					
Flashpoint	Degrees F	<140		122	>200
Corrosivity	pH (S.U.)	<2, >12.5		5.21	6.77
Reactive Sulfide	ppm (mg/kg)	(1)		<0.20	<0.25
Reactive Cyanide	ppm (mg/kg)	(1)		<40.00	<50.4
Solids	%				79.3
TCLP Metals					
Arsenic (As)	mg/L	5.0		<4.00	<1.00
Barium (Ba)	mg/L	100.0		7.18	<0.500
Cadmium (Cd)	mg/L	1.0		<0.40	<0.100
Chromium (Cr)	mg/L	5.0		<0.40	<0.100
Lead (Pb)	mg/L	5.0		<2.00	<0.500
Mercury (Hg)	mg/L	0.2		<0.004	<0.002
Selenium (Se)	mg/L	1.0		<1.00	<0.500
Silver (Ag)	mg/L	5.0		<0.40	<0.100
TCLP VOCs					
Benzene	mg/l	0.5		<25*	<0.05
2-Butanone	mg/l	200		<50.*	<0.10
Carbon tetrachloride	mg/l	0.5		<25.*	<0.05
Chlorobenzene	mg/l	100		<25.*	<0.05
Chloroform	mg/l	6		<25.*	<0.05
1,1-Dichloroethene	mg/l	0.7		<25.*	<0.05
1,2-Dichloroethane	mg/l	0.5		<25.*	<0.05
Tetrachloroethene	mg/l	0.7		<25.*	<0.05
Trichloroethylene	mg/l	0.5		<25.*	<0.05
Vinyl Chloride	mg/l	0.2		<50.*	<0.100
TCLP SVOCs					
Pyridine	mg/l	5.0		<100.000*	<0.10
1,4-Dichlorobenzene	mg/l	7.5		<100.000*	<0.10
2-Methylphenol	mg/l	200.0		<100.000*	<0.10
3&4-Methylphenol	mg/l	200.0		<100.000*	<0.10
Hexachloroethane	mg/l	3.0		<100.000*	<0.10
Nitrobenzene	mg/l	2.0		<100.000*	<0.10
Hexachlorobutadiene	mg/l	0.5		<100.000*	<0.10
2,4,6-Trichlorophenol	mg/l	2.0		<100.000*	<0.10
2,4,5-Trichlorophenol	mg/l	400.0		<500.000*	<0.50
2,4-Dinitrotoluene	mg/l	0.13		<100.000*	<0.10
Hexachlorobenzene	mg/l	0.13		<100.000*	<0.10
Pentachlorophenol	mg/l	100.0		<100.000*	<0.10

Notes:

1. Reactivity criteria are specified in 40CFR Part 261.23
2. The ND indicates that the constituent was not detected.

TABLE 7
WASTE CHARACTERIZATION ANALYTICAL RESULTS - DRILL FLUIDS - LAGOON AREA FRI
STANDARD CHLORINE CHEMICAL CO., INC. SITE
KEARNY, NEW JERSEY

			Waste Type/Description	Drilling Fluids	Drilling Fluids
			Sample Name	HLA-DF-01S	HLA-DF-01A
			Sample Date	9/19/2000	9/19/2000
			Dates Reported (Approx.)	9/23/2000	9/27/2000
PARAMETER	**UNITS**	**TCLP LIMITS**			
RCRA CHARACTERISTICS					
Flashpoint	Degrees F	<140		>200	>200
Corrosivity	pH (S.U.)	<2, >12.5		10.17	10.17
Reactive Sulfide	ppm (mg/kg)	(1)		<0.48	<0.01
Reactive Cyanide	ppm (mg/kg)	(1)		<96.4	<2.0
Solids	%			41.5	
TCLP Metals					
Arsenic (As)	mg/L	5.0		<1.00	<1.00
Barium (Ba)	mg/L	100.0		<0.500	<0.500
Cadmium (Cd)	mg/L	1.0		<0.100	<0.100
Chromium (Cr)	mg/L	5.0		0.568	5.280
Lead (Pb)	mg/L	5.0		<0.500	<0.500
Mercury (Hg)	mg/L	0.2		<0.002	<0.002
Selenium (Se)	mg/L	1.0		<0.500	<0.500
Silver (Ag)	mg/L	5.0		<0.100	<0.100
TCLP VOCs					
Benzene	mg/l	0.5		<0.050	<0.050
2-Butanone	mg/l	200		<0.100	<0.100
Carbon tetrachloride	mg/l	0.5		<0.050	<0.050
Chlorobenzene	mg/l	100		<0.050	<0.050
Chloroform	mg/l	6		<0.050	<0.050
1,1-Dichloroethene	mg/l	0.7		<0.050	<0.050
1,2-Dichloroethane	mg/l	0.5		<0.050	<0.050
Tetrachloroethene	mg/l	0.7		<0.050	<0.050
Trichloroethylene	mg/l	0.5		<0.050	<0.050
Vinyl Chloride	mg/l	0.2		<0.100	<0.100
TCLP SVOCs					
Pyridine	mg/l	5.0		<0.10	<0.10
1,4-Dichlorobenzene	mg/l	7.5		<0.10	<0.10
2-Methylphenol	mg/l	200.0		<0.10	<0.10
3&4-Methylphenol	mg/l	200.0		<0.10	<0.10
Hexachloroethane	mg/l	3.0		<0.10	<0.10
Nitrobenzene	mg/l	2.0		<0.10	<0.10
Hexachlorobutadiene	mg/l	0.5		<0.10	<0.10
2,4,6-Trichlorophenol	mg/l	2.0		<0.10	<0.10
2,4,5-Trichlorophenol	mg/l	400.0		<0.50	<0.50
2,4-Dinitrotoluene	mg/l	0.13		<0.10	<0.10
Hexachlorobenzene	mg/l	0.13		<0.10	<0.10
Pentachlorophenol	mg/l	100.0		<0.10	<0.10

Notes:
1. Reactivity criteria are specified in 40CFR Part 261.23
2. The ND indicates that the constituent was not detected.

TABLE 8
WASTE CHARACTERIZATION ANALYTICAL RESULTS - SRI DRILL CUTTINGS
STANDARD CHLORINE CHEMICAL CO., INC. SITE
KEARNY, NEW JERSEY

		Waste Type/Description	Drill Cuttings
		Sample Name	WH-DC-01
		Sample Date	9/19/2000
		Dates Reported (Approx.)	9/22/2000
PARAMETER	**UNITS**	**TCLP LIMITS**	
RCRA CHARACTERISTICS			
Flashpoint	Degrees F	<140	140
Corrosivity	pH (S.U.)	<2, >12.5	7.91
Reactive Sulfide	ppm (mg/kg)	(1)	<0.25
Reactive Cyanide	ppm (mg/kg)	(1)	<49.3
Solids	%		81.2
TCLP Metals			
Arsenic (As)	mg/L	5.0	<1.00
Barium (Ba)	mg/L	100.0	0.568
Cadmium (Cd)	mg/L	1.0	<0.100
Chromium (Cr)	mg/L	5.0	0.706
Lead (Pb)	mg/L	5.0	<0.500
Mercury (Hg)	mg/L	0.2	<0.002
Selenium (Se)	mg/L	1.0	<0.500
Silver (Ag)	mg/L	5.0	<0.100
TCLP VOCs			
Benzene	mg/l	0.5	<0.05
2-Butanone	mg/l	200	<0.10
Carbon tetrachloride	mg/l	0.5	<0.05
Chlorobenzene	mg/l	100	<0.05
Chloroform	mg/l	6	<0.05
1,1-Dichloroethene	mg/l	0.7	<0.05
1,2-Dichloroethane	mg/l	0.5	<0.05
Tetrachloroethene	mg/l	0.7	<0.05
Trichloroethylene	mg/l	0.5	<0.05
Vinyl Chloride	mg/l	0.2	<0.100
TCLP SVOCs			
Pyridine	mg/l	5.0	<0.10
1,4-Dichlorobenzene	mg/l	7.5	<0.10
2-Methylphenol	mg/l	200.0	<0.10
3&4-Methylphenol	mg/l	200.0	<0.10
Hexachloroethane	mg/l	3.0	<0.10
Nitrobenzene	mg/l	2.0	<0.10
Hexachlorobutadiene	mg/l	0.5	<0.10
2,4,6-Trichlorophenol	mg/l	2.0	<0.10
2,4,5-Trichlorophenol	mg/l	400.0	<0.50
2,4-Dinitrotoluene	mg/l	0.13	<0.10
Hexachlorobenzene	mg/l	0.13	<0.10
Pentachlorophenol	mg/l	100.0	<0.10

Notes:

1. Reactivity criteria are specified in 40CFR Part 261.23
2. The ND indicates that the constituent was not detected.

TABLE 9
WASTE CHARACTERIZATION ANALYTICAL RESULTS - SRI PURGE WATER
STANDARD CHLORINE CHEMICAL CO., INC. SITE
KEARNY, NEW JERSEY

			Waste Type/Description	Purge Water	Purge Water
			Sample Name	WH-PUR-01A	WH-PUR-01K
			Sample Date	9/19/2000	9/19/2000
			Dates Reported (Approx.)	9/28/2000	9/27/2000
PARAMETER	**UNITS**	**TCLP LIMITS**			
RCRA CHARACTERISTICS					
Flashpoint	Degrees F	<140		95	>200
Corrosivity	pH (S.U.)	<2, >12.5		3.20	9.82
Reactive Sulfide	ppm (mg/kg)	(1)		<0.01	<0.21
Reactive Cyanide	ppm (mg/kg)	(1)		<2.0	<42.2
Solids	%				94.7
TCLP Metals					
Arsenic (As)	mg/L	5.0		<2.00	<1.00
Barium (Ba)	mg/L	100.0		<1.000	<0.500
Cadmium (Cd)	mg/L	1.0		<0.200	<0.100
Chromium (Cr)	mg/L	5.0		3.38	0.514
Lead (Pb)	mg/L	5.0		<1.000	<0.500
Mercury (Hg)	mg/L	0.2		<0.002	<0.002
Selenium (Se)	mg/L	1.0		<1.000	<0.500
Silver (Ag)	mg/L	5.0		<0.200	<0.100
TCLP VOCs					
Benzene	mg/l	0.5		0.363	<0.050
2-Butanone	mg/l	200		<0.10	<0.100
Carbon tetrachloride	mg/l	0.5		<0.05	<0.050
Chlorobenzene	mg/l	100		1.873	<0.050
Chloroform	mg/l	6		<0.05	<0.050
1,1-Dichloroethene	mg/l	0.7		<0.05	<0.050
1,2-Dichloroethane	mg/l	0.5		<0.05	<0.050
Tetrachloroethene	mg/l	0.7		0.260	<0.050
Trichloroethylene	mg/l	0.5		1.475	<0.050
Vinyl Chloride	mg/l	0.2		<0.100	<0.100
TCLP SVOCs					
Pyridine	mg/l	5.0		<0.10	<0.10
1,4-Dichlorobenzene	mg/l	7.5		3.32D	<0.10
2-Methylphenol	mg/l	200.0		4.16D	<0.10
3&4-Methylphenol	mg/l	200.0		16.35D	<0.10
Hexachloroethane	mg/l	3.0		<0.10	<0.10
Nitrobenzene	mg/l	2.0		<0.10	<0.10
Hexachlorobutadiene	mg/l	0.5		<0.10	<0.10
2,4,6-Trichlorophenol	mg/l	2.0		<0.10	<0.10
2,4,5-Trichlorophenol	mg/l	400.0		<0.50	<0.50
2,4-Dinitrotoluene	mg/l	0.13		<0.10	<0.10
Hexachlorobenzene	mg/l	0.13		<0.10	<0.10
Pentachlorophenol	mg/l	100.0		<0.10	<0.10

Notes:

1. Reactivity criteria are specified in 40CFR Part 261.23
2. The ND indicates that the constituent was not detected.

TABLE 10
WASTE CHARACTERIZATION ANALYTICAL RESULTS - SRI DRILL FLUIDS
STANDARD CHLORINE CHEMICAL CO., INC. SITE
KEARNY, NEW JERSEY

		Waste Type/Description	Drilling Fluids	Drilling Fluids
		Sample Name	**WH-DF-01A**	**WH-DF-01S**
		Sample Date	9/19/2000	9/19/2000
		Dates Reported (Approx.)	9/27/2000	9/22/2000
PARAMETER	**UNITS**	**TCLP LIMITS**		
RCRA CHARACTERISTICS				
Flashpoint	Degrees F	<140	122	>200
Corrosivity	pH (S.U.)	<2, >12.5	9.21	11.56
Reactive Sulfide	ppm (mg/kg)	(1)	<0.01	<0.32
Reactive Cyanide	ppm (mg/kg)	(1)	<2.0	<64.8
Solids	%			61.7
TCLP Metals				
Arsenic (As)	mg/L	5.0	<1.00	<1.00
Barium (Ba)	mg/L	100.0	<0.500	0.570
Cadmium (Cd)	mg/L	1.0	<0.100	0.106
Chromium (Cr)	mg/L	5.0	<0.100	<0.100
Lead (Pb)	mg/L	5.0	<0.500	3.98
Mercury (Hg)	mg/L	0.2	<0.002	<0.002
Selenium (Se)	mg/L	1.0	<0.500	<0.500
Silver (Ag)	mg/L	5.0	<0.100	<0.100
TCLP VOCs				
Benzene	mg/l	0.5	<0.100	<0.050
2-Butanone	mg/l	200	<0.200	<0.100
Carbon tetrachloride	mg/l	0.5	<0.100	<0.050
Chlorobenzene	mg/l	100	0.388	<0.050
Chloroform	mg/l	6	<0.100	<0.050
1,1-Dichloroethene	mg/l	0.7	<0.100	<0.050
1,2-Dichloroethane	mg/l	0.5	<0.100	<0.050
Tetrachloroethene	mg/l	0.7	<0.100	<0.050
Trichloroethylene	mg/l	0.5	<0.100	<0.050
Vinyl Chloride	mg/l	0.2	<0.200	<0.100
TCLP SVOCs				
Pyridine	mg/l	5.0	<0.10	<0.10
1,4-Dichlorobenzene	mg/l	7.5	3.66E	0.33
2-Methylphenol	mg/l	200.0	<0.10	<0.10
3&4-Methylphenol	mg/l	200.0	<0.10	<0.10
Hexachloroethane	mg/l	3.0	<0.10	<0.10
Nitrobenzene	mg/l	2.0	<0.10	<0.10
Hexachlorobutadiene	mg/l	0.5	<0.10	<0.10
2,4,6-Trichlorophenol	mg/l	2.0	<0.10	<0.10
2,4,5-Trichlorophenol	mg/l	400.0	<0.50	<0.50
2,4-Dinitrotoluene	mg/l	0.13	<0.10	<0.10
Hexachlorobenzene	mg/l	0.13	<0.10	<0.10
Pentachlorophenol	mg/l	100.0	<0.10	<0.10

Notes:

1. Reactivity criteria are specified in 40CFR Part 261.23
2. The ND indicates that the constituent was not detected.

TABLE 11
WASTE CHARACTERIZATION ANALYTICAL RESULTS - SRI PPE
STANDARD CHLORINE CHEMICAL CO., INC. SITE
KEARNY, NEW JERSEY

		Waste Type/Description	PPE
		Sample Name	WH-PPE-01
		Sample Date	9/19/2000
		Dates Reported (Approx.)	9/27/2000
PARAMETER	**UNITS**	**TCLP LIMITS**	
RCRA CHARACTERISTICS			
Flashpoint	Degrees F	<140	>200
Corrosivity	pH (S.U.)	<2, >12.5	7.77
Reactive Sulfide	ppm (mg/kg)	(1)	<0.21
Reactive Cyanide	ppm (mg/kg)	(1)	<41.4
Solids	%		96.6
TCLP Metals			
Arsenic (As)	mg/L	5.0	<1.00
Barium (Ba)	mg/L	100.0	<0.500
Cadmium (Cd)	mg/L	1.0	<0.100
Chromium (Cr)	mg/L	5.0	<0.100
Lead (Pb)	mg/L	5.0	<0.500
Mercury (Hg)	mg/L	0.2	<0.002
Selenium (Se)	mg/L	1.0	<0.500
Silver (Ag)	mg/L	5.0	<0.100
TCLP VOCs			
Benzene	mg/l	0.5	<0.05
2-Butanone	mg/l	200	<0.10
Carbon tetrachloride	mg/l	0.5	<0.05
Chlorobenzene	mg/l	100	<0.05
Chloroform	mg/l	6	<0.05
1,1-Dichloroethene	mg/l	0.7	<0.05
1,2-Dichloroethane	mg/l	0.5	<0.05
Tetrachloroethene	mg/l	0.7	<0.05
Trichloroethylene	mg/l	0.5	<0.05
Vinyl Chloride	mg/l	0.2	<0.100
TCLP SVOCs			
Pyridine	mg/l	5.0	<0.10
1,4-Dichlorobenzene	mg/l	7.5	<0.10
2-Methylphenol	mg/l	200.0	<0.10
3&4-Methylphenol	mg/l	200.0	<0.10
Hexachloroethane	mg/l	3.0	<0.10
Nitrobenzene	mg/l	2.0	<0.10
Hexachlorobutadiene	mg/l	0.5	<0.10
2,4,6-Trichlorophenol	mg/l	2.0	<0.10
2,4,5-Trichlorophenol	mg/l	400.0	<0.50
2,4-Dinitrotoluene	mg/l	0.13	<0.10
Hexachlorobenzene	mg/l	0.13	<0.10
Pentachlorophenol	mg/l	100.0	<0.10

Notes:
1. Reactivity criteria are specified in 40CFR Part 261.23
2. The ND indicates that the constituent was not detected.

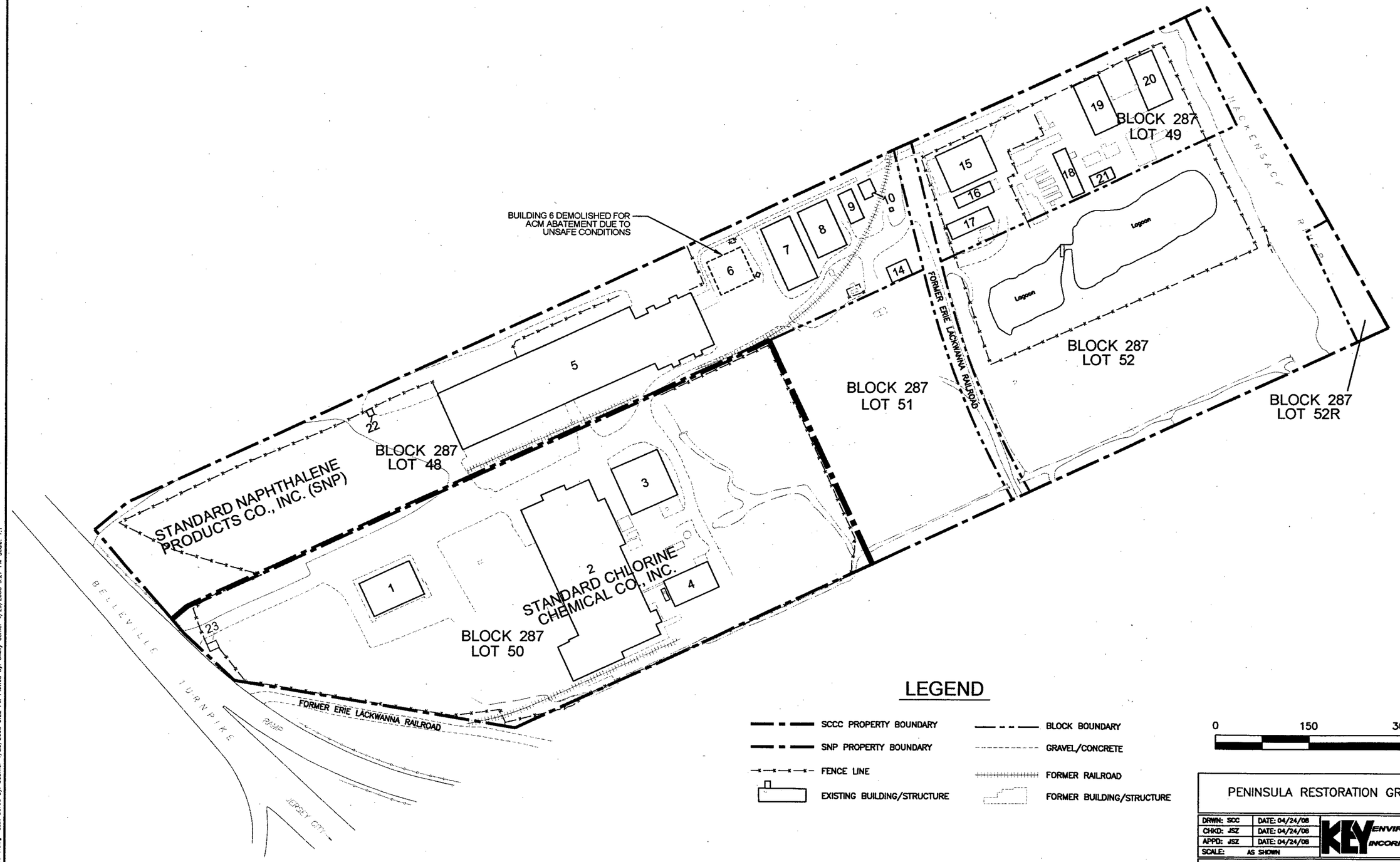
TABLE 12
WASTE CHARACTERIZATION SAMPLING AND ANALYSIS SUMMARY
STANDARD CHLORINE CHEMICAL COMPANY, INC,
PENINSULA RESTORATION GROUP
KEARNY, NEW JERSEY

					Proposed Analytical Parameters [3]							
Group [1]	Description	No. of Drums	Estimated Volume	Proposed No. of Samples	RCRA Char.[2]	TCLP VOCs	TCLP SVOCs	TCLP Metals	PCBs	Total Organic Halogens	BTU	Ammonia
A	Asbestos Containing Material	362	99 cu. yds.	5	X	X	X	X	X			
B	AST 9 and 13 Contents	42	11 cu. yds.	1					X	X	X	X
C	AST 10 Contents	11	3 cu. yds.	1					X	X	X	X
D	AST 11 Contents	25	7 cu. yds.	1					X	X	X	X
E	AST 12 Contents	17	5 cu. yds.	1	X		X		X	X	X	X
F	AST Unmarked	14	4 cu.yds	1	X	X	X	X	X	X	X	X
G	AST Unmarked Liquids	2	110 gallons	1	X	X	X	X	X	X	X	X
H	AST PPE and Other PPE	22	6 cu.yds.	1	X	X	X	X	X			
I	AST Trash	8	2 cu. yds	1	X	X	X	X	X			
J	Cement and Construction Debris	1	0.25 cu. yds.	1		X	X	X	X			
K	Warehouse Machine Oil	1	55 gallons	1	X	X	X	X	X	X	X	
L	Lagoon Solids	11	3 cu. yds.	1	X	X	X	X	X	X	X	X
N	Warehouse Drill Cuttings	4	1 cu. yds.	1		X	X	X	X	X	X	X
Q	Warehouse Misc. Fluids	6	330 gallons	1	X	X	X	X	X	X	X	X

(1) Additional sampling is not required for Groups M, O, P and S.
(2) RCRA Characteristics are Ignitability, Reactivity and Corrosivity
(3) All analyses will be conducted using EPA SW-846 Methods

Figures

FIGURES



LEGEND

- SCCC PROPERTY BOUNDARY
- SNP PROPERTY BOUNDARY
- FENCE LINE
- EXISTING BUILDING/STRUCTURE
- BLOCK BOUNDARY
- GRAVEL/CONCRETE
- FORMER RAILROAD
- FORMER BUILDING/STRUCTURE

0 150 300 FEET

PENINSULA RESTORATION GROUP

DRWN: SCC	DATE: 04/24/08	KEY ENVIRONMENTAL INCORPORATED
CHKD: JSZ	DATE: 04/24/08	
APPD: JSZ	DATE: 04/24/08	
SCALE: AS SHOWN		

SITE-SPECIFIC SAMPLING AND ANALYSIS PLAN
SCCC SITE
KEARNY, NEW JERSEY

SITE PLAN

PROJECT NO: 08-665
FIGURE 1

REV #	DATE	DESCRIPTION	APPD
1			
2			
3			

REFERENCE:

ISSUE DATE:

KEY ENVIRONMENTAL, INC.
200 THIRD AVENUE
CARNEGIE, PA 15106

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Attachment A

ATTACHMENT A

CORRESPONDENCE

Jim Zubrow

From: Gerry Coscia [gcoscia@Langan.com]

Sent: Wednesday, March 26, 2008 1:15 PM

To: Chris Kanakis

Cc: mwkscc1@aol.com; jzubrow@keyenvir.com; McChesney, Charles E. (Pittsburgh) NA; Brourman, Mitch (Pittsburgh) NA; Enrique Castro; Lori.Mills@dbr.com

Subject: Schedule for Removal of Containerized Material from the Standard Chlorine Site

Hi Chris,
The Peninsula Restoration Group (PRG) has developed a milestone schedule for dealing with the containerized material at the Standard Chlorine Chemical Company (SCCC) site. This schedule is presented below and supplements the PRG's Interim Response Action Workplan (IRAW) Addendum dated 16 November 2007 which you are currently reviewing.

To rectify an inconsistency between *Response to Issue Number 5* in the IRAW Addendum and the schedule described below, one modification is necessary to that response. Please replace the last paragraph in the *Response to Issue Number 5* with the following text:

"The proposed text revisions are attached for NJDEP review. Note that analytical information exists for the containerized materials; additional waste classification sampling and analysis may not be necessary for these materials. The Waste Classification Unit of the NJDEP's Division of Solid and Hazardous Waste will be consulted to determine whether any additional data are needed for NJDEP to make an appropriate waste classification determination. Bids have previously been solicited for this material and potential offsite treatment and disposal facilities have been identified as subsequently discussed in response to Issue 7. Bidders have provided proposals which include any requisite sampling and analysis to ensure that the materials meet their facility's acceptance criteria."

The tasks and the schedule presented below are consistent with the approach for containerized material removal described in the IRAW Addendum and the replacement text noted above.

Task 1

- Within 30 calendar days of receipt of the NJDEP's approval of the IRAW Addendum, the PRG will prepare and submit a site-specific sampling plan to the Waste Classification Unit of the NJDEP's Division of Solid and Hazardous Waste. The site-specific sampling plan will be prepared in accordance with the Waste Classification Unit's guidance document dated 30 August 2001. The purpose of the site-specific sampling will be to obtain any data needed to supplement the historical sampling results for the containerized material such that the NJDEP can make an appropriate waste classification determination.
- A copy of the site-specific sampling plan and the historical sampling results will also be provided to the treatment, storage or disposal (TSD) facilities that will be considered for disposal of the containerized materials.

Task 2

- Within 105 calendar days of receipt of the Waste Classification Unit's approval of the site-specific sampling plan, the PRG will prepare and submit Waste Classification Request Form HWM-009 to the Waste Classification Unit for a determination of the waste classification of the containerized material. The duration of this task is based on the following components: mobilization - 15 days; sampling - 15 days; laboratory analysis - 60 days (this includes an allowance of extended laboratory turnaround for dioxin analysis, if needed); and, preparation of the Waste Classification Request Form and supporting documentation - 15 days.

- During this task, the TSD facilities that, for permit compliance purposes, require additional data not addressed in the site-specific sampling plan or by the historical sampling results will collect the necessary samples for their separate evaluation.
- If the Waste Classification Unit determines in Task 1 that no additional data are needed for its determination of waste classification, then the overall duration of Task 2 may be reduced.

Task 3

- Within 90 calendar days of receipt of the Waste Classification Unit's determination of the waste classification of the containerized material, the PRG will arrange for and complete the removal of the containerized material from the SCCC site to appropriate TSD facilities.

As you can see, the PRG has integrated the TSD facility procurement process with the waste classification process so as to expedite the overall schedule.

The PRG requests that this supplement to the IRAW Addendum be considered during your review.

Regards,
Gerry

Gerard M. Coscia, PE
SENIOR ASSOCIATE
Direct: 201.398.4609 **Cell:** 201.665.6430

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Attachment B

ATTACHMENT B

MAY 2000 INVENTORY SHEET

Table 1
STANDARD CHLORINE CHEMICAL COMPANY
KEARNY, NEW JERSEY
DRUM INSPECTION & INVENTORY
May 22, 2000

	Drum Break Down																
	57 gal poly drum				dioxin	AST					*55 gallon metal drum*			dioxin	Drums [1]		
AREA	water	soil	drilling fluid	empty	sampling material	C9	C10	C11	C12	C13	water	soil	empty	sampling material	Asbestos	Other	Date
1																1 55-gallon drum; trash bags, and jarred soil samples	10/98 - 1/99 Investigation
2											7[2]	3[3]					10/98 - 1/99 Investigation
3				**26**													
4				**3**													
5				**1**												**47 quart poly containers of drain cleaner; trade names: Mule Kick, Wilmar, and Drain Snake**	
6													**3**			**3 (5-20 gal poly containers - misc. liquid/chemicals, unlabeled)**	
7				**1**												**2 - 5 gal steel empty; 1 - 55 gal steel machine oil**	
8	1[2]															**1 (55 gal poly drum, bailers - solid - trash)**	10/98 - 1/99 Investigation
9				**9**												**1 (shipping "popcorn" - 55 gal poly drum)**	
10		1[4]											**5**				
11													**13**			**1 - 55 gal labeled GL-226B - Ashland Chemical Dibasic Ester, MSDS on drum**	
12																**2- 20 gal metal empty**	
13				**4**									**1**			**EMPTY - (8) 5-10 gal**	
14			1 (SB-1)														8/96 Investigation
15			1 (SB-4)														8/96 Investigation
16											**1**						
17													**1**				
18																**2 - 5 gal poly container water & oil (crankcase)**	
19			1 (SB-10)										**1**				8/96 Investigation
20													**1**				
21																**10 drums - Solid N.O.S. ORM-E RQ-NA 9188 -55 gal-metal**	
22			1 (SB-7)														8/96 Investigation
23			1 (SB-8)														8/96 Investigation
24															362	8 bags of Asbestos	10/91 Interim Remedial Measure
25			1 (SB-9)														8/96 Investigation
26			1 (SB-3)														8/96 Investigation
27			1 (SB-2)														8/96 Investigation
28					1												1987 Investigation
29					1									13			1987 Investigation
30			1 (SB-5)														8/96 Investigation
31			1 (SB-14)														8/96 Investigation
32			1 (SB-6)														8/96 Investigation
33			1 (SB-12)														8/96 Investigation
34			1 (SB-4)														8/96 Investigation
35			1 (SB-5)														8/96 Investigation
36						16	13	25	17	31					2	26 drums (57 gal-blue) of trash and PPE	12/90 Interim Remedial Measure
Total	*1*	*1*	*14*	*44*	*2*	*16*	*13*	*25*	*17*	*31*	*8*	*3*	*25*	*13*	*364*		

Notes:
(1) - Mixture of plastic and metal drums - 55 gallons
(2) - Purge or development water
(3) - Soil cuttings from investigations
(4) - Solids, consists of cement and construction debris
- Items in **bold** print are to be disposed of off site

ATTACHMENT C

NOVEMBER 2000 FINAL INVENTORY

ENVIRO-SCIENCES, INC.
HEADQUARTERS
111 HOWARD BOULEVARD, SUITE 108
MOUNT ARLINGTON, NJ 07856
(973) 398-8183 • FAX: (973) 398-8037

November 7, 2000

Ms. Maria Franco-Spera
Case Manager
Bureau of State Case Management
New Jersey Department of Environmental Protection
401 East State Street
P.O. Box 028
Trenton, NJ 08625-0028

Re: Standard Chlorine Chemical Company Site
Kearny, New Jersey

Dear Maria:

As you have requested, a copy of the drum storage inventory at the referenced facility is enclosed. Also, permanent signs for the "sea boxes" will be affixed by November 10, 2000. If you have any questions or comments, please do not hesitate to contact me at (973) 398-8183 or by e-mail me at rworkman@enviro-sciences.com.

Very truly yours,

ENVIRO-SCIENCES, INC.

Robert Workman, P.G.
Director, Hydrogeology

RW/jw

Enclosure

cc: Margaret Kelly, Esq., SCCC
Irving Cohen, Enviro-Sciences, Inc.
Chris Kanakis, NJDEP

Table 1
Summary of Drum Storage
Former Standard Chlorine Chemical Company
1035 Bellville Tpk
Kearny, NJ

ESI DRUM NUMBER	CURRENT LOCATION OF DRUM		DESCRIPTION OF DRUM AND/OR CONTENTS AS NOTED IN THE MAY 22, 2000 DRUM INSPECTION AND INVENTORY TABLE
	ESI CONTAINER DESCRIPTION	CONTAINER REGISTRATION #	
1	# 1 - grey	4269537-4310	ACM Material (57gal poly drum)
2	"	"	"
3	"	"	"
4	"	"	"
5	"	"	"
6	"	"	"
7	"	"	"
8	"	"	"
9	"	"	"
10	"	"	"
11	"	"	"
12	"	"	"
13	"	"	"
14	"	"	"
15	"	"	"
16	"	"	"
17	"	"	"
18	"	"	"
19	"	"	"
20	"	"	"
21	"	"	"
22	"	"	"
23	"	"	"
24	"	"	"
25	"	"	"
26	"	"	"
27	"	"	"
28	"	"	"
29	"	"	"
30	"	"	"
31	"	"	"
32	"	"	"
33	"	"	"
34	"	"	"
35	"	"	"
36	"	"	"
37	"	"	"
38	"	"	"
39	"	"	"
40	"	"	"
41	"	"	"
42	"	"	"
43	"	"	"
44	"	"	"

Notes:
" = Same As Above
ACM = Asbestos Containing Material
CYL = Cylinder

Table 1
Summary of Drum Storage
Former Standard Chlorine Chemical Company
1035 Bellville Tpk
Kearny, NJ

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	ESI CONTAINER DESCRIPTION	CONTAINER REGISTRATION #	
45	"	"	"
46	"	"	"
47	"	"	"
48	"	"	"
49	"	"	"
50	"	"	"
51	"	"	"
52	"	"	"
53	"	"	"
54	"	"	"
55	"	"	"
56	"	"	"
57	"	"	"
58	"	"	"
59	"	"	"
60	"	"	"
61	"	"	"
62	"	"	"
63	"	"	"
64	"	"	"
65	"	"	"
66	"	"	"
67	"	"	"
68	"	"	"
69	"	"	"
70	"	"	"
71	"	"	"
72	"	"	"
73	"	"	"
74	"	"	"
75	"	"	"
76	"	"	"
77	"	"	"
78	"	"	"
79	"	"	"
80	"	"	"
81	"	"	"
82	"	"	"
83	"	"	"
84	"	"	"
85	"	"	"
86	"	"	"
87	"	"	"
88	"	"	"

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Table 1
Summary of Drum Storage
Former Standard Chlorine Chemical Company
1035 Bellville Tpk
Kearny, NJ

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	ESI CONTAINER DESCRIPTION	CONTAINER REGISTRATION #	
89	"	"	"
90	"	"	"
91	"	"	"
92	"	"	"
93	"	"	"
94	"	"	"
95	"	"	"
96	"	"	"
97	"	"	"
98	"	"	"
99	"	"	"
100	"	"	"
101	"	"	"
102	"	"	"
103	"	"	"
104	"	"	"
105	"	"	"
106	"	"	"
107	"	"	"
108	"	"	"
109	# 2 - red	800978-4310	ACM Material (57gal poly drum)
110	"	"	"
111	"	"	"
112	"	"	"
113	"	"	"
114	"	"	"
115	"	"	"
116	"	"	"
117	"	"	"
118	"	"	"
119	"	"	"
120	"	"	"
121	"	"	"
122	"	"	"
123	"	"	"
124	"	"	"
125	"	"	"
126	"	"	"
127	"	"	"
128	"	"	"
129	"	"	"
130	"	"	"
131	"	"	"
132	"	"	"

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Table 1
Summary of Drum Storage
Former Standard Chlorine Chemical Company
1035 Bellville Tpk
Kearny, NJ

ESI DRUM NUMBER	CURRENT LOCATION OF DRUM		DESCRIPTION OF DRUM AND/OR CONTENTS AS NOTED IN THE MAY 22, 2000 DRUM INSPECTION AND INVENTORY TABLE
	ESI CONTAINER DESCRIPTION	CONTAINER REGISTRATION #	
133	"	"	"
134	"	"	"
135	"	"	"
136	"	"	"
137	"	"	"
138	"	"	"
139	"	"	"
140	"	"	"
141	"	"	"
142	"	"	"
143	"	"	"
144	"	"	"
145	"	"	"
146	"	"	"
147	"	"	"
148	"	"	"
149	"	"	"
150	"	"	"
151	"	"	"
152	"	"	"
153	"	"	"
154	"	"	"
155	"	"	"
156	"	"	"
157	"	"	"
158	"	"	"
159	"	"	"
160	"	"	"
161	"	"	"
162	"	"	"
163	"	"	"
164	"	"	"
165	"	"	"
166	"	"	"
167	"	"	"
168	"	"	"
169	"	"	"
170	"	"	"
171	"	"	"
172	"	"	"
173	"	"	"
174	"	"	"
175	"	"	"
176	"	"	"

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Table 1
Summary of Drum Storage
Former Standard Chlorine Chemical Company
1035 Bellville Tpk
Kearny, NJ

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	ESI CONTAINER DESCRIPTION	CONTAINER REGISTRATION #	
177	"	"	"
178	"	"	"
179	"	"	"
180	"	"	"
181	"	"	"
182	"	"	"
183	"	"	"
184	"	"	"
185	"	"	"
186	"	"	"
187	"	"	"
188	"	"	"
189	"	"	"
190	"	"	"
191	"	"	"
192	"	"	"
193	"	"	"
194	"	"	"
195	"	"	"
196	"	"	"
197	"	"	"
198	"	"	"
199	"	"	"
200	"	"	"
201	"	"	"
202	"	"	"
203	"	"	"
204	"	"	"
205	"	"	"
206	# 3 - red	801793-4310	ACM Material (57gal poly drum)
207	"	"	"
208	"	"	"
209	"	"	"
210	"	"	"
211	"	"	"
212	"	"	"
213	"	"	"
214	"	"	"
215	"	"	"
216	"	"	"
217	"	"	"
218	"	"	"
219	"	"	"
220	"	"	"

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Table 1
Summary of Drum Storage
Former Standard Chlorine Chemical Company
1035 Bellville Tpk
Kearny, NJ

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	ESI CONTAINER DESCRIPTION	CONTAINER REGISTRATION #	
221	"	"	"
222	"	"	"
223	"	"	"
224	"	"	"
225	# 6 - red	4327989-4310	Warehouse Drums - Steel 55 gal - Drill Cuttings
226	"	"	Warehouse Drums - Steel 55 gal - Drill Cuttings
227	"	"	Warehouse Drums - Steel 55 gal - Drill Cuttings
228	"	"	Warehouse Drums - Poly 15 gal - Misc. Liquid
229	"	"	Warehouse Drums - Steel 55 gal - Drill Cuttings
230	"	"	Warehouse Drums - Poly 15 gal - Misc. Liquid
231	"	"	Warehouse Drums - 5 gal - Misc. Liquid
232	"	"	Warehouse Drums - Steel 55 gal - Machine Oil
233	"	"	Warehouse Drums - Poly 57 gal - Cement Debri
234	"	"	Warehouse Drums - 5 gal - Misc. Liquid
235	"	"	Warehouse Drums - 5 gal - Misc. Liquid
236	"	"	Warehouse Drums - Steel 55 gal - Crushed
237	"	"	Warehouse Drums - Steel 55 gal - Purge Water
238	"	"	Warehouse Drums - PPE
239	"	"	Warehouse Drums - PPE
240	"	"	Warehouse Drums - PPE
241	"	"	Warehouse Drums - Steel Overpack - Liquid
242	"	"	Warehouse Drums - Steel 55 gal - Purge Water
243	"	"	Warehouse Drums - Steel 55 gal - Purge Water
244	"	"	Warehouse Drums - Steel 55 gal - Drill Fluids
245	"	"	Warehouse Drums - Steel 55 gal - Purge Water
246	"	"	Warehouse Drums - Steel 55 gal - Drill Fluids
247	"	"	Warehouse Drums - Steel 55 gal - Purge Water
248	"	"	Warehouse Drums - Steel 55 gal - Purge Water
249	"	"	Warehouse Drums - Steel 55 gal - Purge Water
250	"	"	Warehouse Drums - Steel 55 gal - Purge Water
251	# 3 - red	801793-4310	ACM Material (57gal poly drum)
252	"	"	"
253	"	"	"
254	"	"	"
255	"	"	"
256	"	"	"
257	"	"	"
258	"	"	"
259	"	"	"
260	"	"	"
261	"	"	"
262	"	"	"
263	"	"	"
264	"	"	"

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Table 1
Summary of Drum Storage
Former Standard Chlorine Chemical Company
1035 Bellville Tpk
Kearny, NJ

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	ESI CONTAINER DESCRIPTION	CONTAINER REGISTRATION #	
265	"	"	"
266	"	"	"
267	"	"	"
268	"	"	"
269	"	"	"
270	"	"	"
271	"	"	"
272	"	"	"
273	"	"	"
274	"	"	"
275	"	"	"
276	"	"	"
277	"	"	"
278	"	"	"
279	"	"	"
280	"	"	"
281	"	"	"
282	"	"	"
283	"	"	"
284	"	"	"
285	"	"	"
286	"	"	"
287	"	"	"
288	"	"	"
289	"	"	"
290	"	"	"
291	"	"	"
292	"	"	"
293	"	"	"
294	"	"	"
295	"	"	"
296	"	"	"
297	"	"	"
298	"	"	"
299	"	"	"
300	"	"	"
301	"	"	"
302	"	"	"
303	"	"	"
304	"	"	"
305	"	"	"
306	"	"	"
307	"	"	"
308	"	"	"

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Summary of Drum Storage
Former Standard Chlorine Chemical Company
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	ESI CONTAINER DESCRIPTION	CONTAINER REGISTRATION #	
309	"	"	"
310	"	"	"
311	"	"	"
312	"	"	"
313	"	"	"
314	"	"	"
315	"	"	"
316	"	"	"
317	"	"	"
318	"	"	"
319	"	"	"
320	"	"	"
321	"	"	"
322	"	"	"
323	"	"	"
324	"	"	"
325	"	"	"
326	"	"	"
327	"	"	"
328	"	"	"
329	"	"	"
330	"	"	"
331	# 4 - red	4057749-4310	ACM Material (57gal poly drum)
332	"	"	"
333	"	"	"
334	"	"	"
335	"	"	"
336	"	"	"
337	"	"	"
338	"	"	"
339	"	"	"
340	"	"	"
341	"	"	"
342	"	"	"
343	"	"	"
344	"	"	"
345	"	"	"
346	"	"	"
347	"	"	"
348	"	"	"
349	"	"	"
350	"	"	"
351	"	"	"
352	"	"	"

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Summary of Drum Storage
Former Standard Chlorine Chemical Company
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	ESI CONTAINER DESCRIPTION	CONTAINER REGISTRATION #	
353	"	"	"
354	"	"	"
355	"	"	"
356	"	"	"
357	"	"	"
358	"	"	"
359	"	"	"
360	"	"	"
361	"	"	"
362	"	"	"
363	"	"	"
364	"	"	"
365	"	"	"
366	"	"	"
367	"	"	"
368	"	"	"
369	"	"	"
370	"	"	"
371	"	"	"
372	"	"	"
373	"	"	"
374	"	"	"
375	"	"	"
376	# 6 - red	4327989-4310	Lagoon Drums - Poly 57 gal - Drilling Fluids
377	"	"	"
378	"	"	"
379	"	"	"
380	"	"	"
381	"	"	"
382	"	"	"
383	"	"	"
384	"	"	"
385	"	"	"
386	"	"	"
387	"	"	Lagoon Drums - Overpacks - Solid NOS
388	"	"	"
389	"	"	"
390	"	"	"
391	"	"	"
392	"	"	"
393	"	"	"
394	"	"	"
395	"	"	"
396	"	"	"

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	ESI CONTAINER DESCRIPTION	CONTAINER REGISTRATION #	
397	"	"	"
398	# 4 - red	4057749-4310	ACM BLDG - Yellow Overpack - Unknown Solids
399	"	"	ACM BLDG - Open Top - Garbage
400	"	"	ACM Material (57gal poly drum)
401	"	"	"
402	"	"	"
403	"	"	"
404	"	"	"
405	"	"	"
406	"	"	"
407	"	"	"
408	"	"	"
409	# 5 - red	801138-4310	AST - Poly 57 gal - Per Cloth
410	"	"	AST - Poly 57 gal - CC-11
411	"	"	AST - Poly 57 gal - CC-13
412	"	"	AST - Poly 57 gal - Garbage
413	"	"	AST - Poly 57 gal - Per Cloth
414	"	"	AST - Poly 57 gal - Per Cloth
415	"	"	AST - Poly 57 gal - Per Cloth
416	"	"	AST - Poly 57 gal - CC-11
417	"	"	AST - Poly 57 gal - Per Cloth
418	"	"	AST - Poly 57 gal - CC-12
419	"	"	AST - Poly 57 gal - CC-12
420	"	"	AST - Poly 57 gal - Per Cloth
421	"	"	AST - Poly 57 gal - CC-12
422	"	"	AST - Poly 57 gal - Garbage
423	"	"	AST - Poly 57 gal - Per Cloth
424	"	"	AST - Poly 57 gal - Per Cloth
425	"	"	AST - Poly 57 gal - Per Cloth
426	"	"	AST - Poly 57 gal - CC-11
427	"	"	AST - Poly 57 gal - Per Cloth
428	"	"	AST - Poly 57 gal - Per Cloth
429	"	"	AST - Poly 57 gal - CC-13
430	"	"	AST - Poly 57 gal - Unmarked
431	"	"	AST - Poly 57 gal - CC-13
432	"	"	AST - Poly 57 gal - CC-13
433	"	"	AST - Poly 57 gal - CC-11
434	"	"	AST - Poly 57 gal - Garbage
435	"	"	AST - Poly 57 gal - Garbage
436	"	"	AST - Poly 57 gal - CC-13
437	"	"	AST - Poly 57 gal - CC-13
438	# 4 - red	4057749-4310	ACM Material (57gal poly drum)
439	# 5 - red	801138-4310	AST - Poly 57 gal - Per Cloth
440	"	"	AST - Poly 57 gal - Garbage

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1035 Bellville Tpk
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	ESI CONTAINER DESCRIPTION	CONTAINER REGISTRATION #	
441	"	"	AST - Poly 57 gal - Garbage
442	"	"	AST - Poly 57 gal - Per Cloth
443	"	"	AST - Poly 57 gal - Unmarked
444	"	"	AST - Poly 57 gal - Unmarked
445	"	"	AST - Poly 57 gal - Garbage
446	"	"	AST - Poly 57 gal - CC-11
447	"	"	AST - Poly 57 gal - CC-13
448	"	"	AST - Poly 57 gal - CC-13
449	"	"	AST - Poly 57 gal - CC-13
450	"	"	AST - Poly 57 gal - CC-13
451	"	"	AST - Poly 57 gal - CC-11
452	"	"	AST - Poly 57 gal - CC-13
453	"	"	AST - Poly 57 gal - CC-13
454	"	"	AST - Poly 57 gal - CC-13
455	"	"	AST - Poly 57 gal - CC-13
456	"	"	AST - Poly 57 gal - CC-13
457	"	"	AST - Poly 57 gal - CC-13
458	"	"	AST - Poly 57 gal - CC-13
459	"	"	AST - Poly 57 gal - CC-13
460	"	"	AST - Poly 57 gal - CC-13
461	"	"	AST - Poly 57 gal - CC-13
462	"	"	AST - Poly 57 gal - CC-13
463	"	"	AST - Poly 57 gal - CC-13
464	"	"	AST - Poly 57 gal - Per Cloth
465	"	"	AST - Poly 57 gal - CC-13
466	"	"	AST - Poly 57 gal - CC-13
467	"	"	AST - Poly 57 gal - CC-13
468	"	"	AST - Poly 57 gal - CC-11
469	"	"	AST - Poly 57 gal - Unmarked
470	"	"	AST - Poly 57 gal - Unmarked
471	"	"	AST - Poly 57 gal - CC-13
472	"	"	AST - Poly 57 gal - Per Cloth
473	"	"	AST - Poly 57 gal - CC-11
474	"	"	AST - Poly 57 gal - Per Cloth
475	"	"	AST - Poly 57 gal - Per Cloth
476	"	"	AST - Poly 57 gal - Per Cloth
477	"	"	AST - Poly 57 gal - Per Cloth
478	"	"	AST - Poly 57 gal - CC-13
479	"	"	AST - Poly 57 gal - Per Cloth
480	"	"	AST - Poly 57 gal - CC-11
481	# 4 - red	4057749-4310	ACM Material (57gal poly drum)
482	# 5 - red	801138-4310	AST - Poly 57 gal - Garbage
483	"	"	AST - Poly 57 gal - CC-13
484	"	"	AST - Poly 57 gal - Unmarked Liquid

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	ESI CONTAINER DESCRIPTION	CONTAINER REGISTRATION #	
485	"	"	AST - Poly 57 gal - Unmarked Liquid
486	"	"	AST - Poly 57 gal - Per Cloth
487	"	"	AST - Poly 57 gal - CC-11
488	"	"	AST - Poly 57 gal - Unmarked
489	"	"	AST - Poly 57 gal - Unmarked
490	"	"	AST - Poly 57 gal - CC-13
491	"	"	AST - Poly 57 gal - CC-11
492	"	"	AST - Poly 57 gal - CC-13
493	"	"	AST - Poly 57 gal - CC-12
494	"	"	AST - Poly 57 gal - CC-11
495	"	"	AST - Poly 57 gal - CC-12
496	"	"	AST - Poly 57 gal - CC-12
497	"	"	AST - Poly 57 gal - CC-11
498	"	"	AST - Poly 57 gal - CC-12
499	"	"	AST - Poly 57 gal - CC-12
500	"	"	AST - Poly 57 gal - CC-11
501	"	"	AST - Poly 57 gal - CC-12
502	"	"	AST - Poly 57 gal - CC-12
503	"	"	AST - Poly 57 gal - CC-11
504	"	"	AST - Poly 57 gal - CC-12
505	"	"	AST - Poly 57 gal - CC-11
506	"	"	AST - Poly 57 gal - CC-11
507	"	"	AST - Poly 57 gal - CC-12
508	"	"	AST - Poly 57 gal - CC-12
509	"	"	AST - Poly 57 gal - CC-12
510	"	"	AST - Poly 57 gal - CC-12
511	"	"	AST - Poly 57 gal - CC-11
512	"	"	AST - Poly 57 gal - CC-11
513	"	"	AST - Poly 57 gal - CC-11
514	"	"	AST - Poly 57 gal - CC-11
515	"	"	AST - Poly 57 gal - Unmarked
516	"	"	AST - Poly 57 gal - CC-11
517	"	"	AST - Poly 57 gal - CC-11
518	"	"	AST - Poly 57 gal - CC-11
519	# 6 - red	4327989-4310	AST - Poly 57 gal - CC-9
520	"	"	AST - Poly 57 gal - CC-9
521	"	"	AST - Poly 57 gal - CC-9
522	"	"	AST - Poly 57 gal - CC-9
523	"	"	AST - Poly 57 gal - CC-9
524	"	"	AST - Poly 57 gal - CC-9
525	"	"	AST - Poly 57 gal - CC-9
526	"	"	AST - Poly 57 gal - CC-9
527	"	"	AST - Poly 57 gal - Unmarked
528	"	"	AST - Poly 57 gal - CC-9

Notes:
" = Same As Above
ACM = Asbestos Containing Material
CYL = Cylinder

Table 1
Summary of Drum Storage
Former Standard Chlorine Chemical Company
1035 Bellville Tpk
Kearny, NJ

ESI DRUM NUMBER	CURRENT LOCATION OF DRUM		DESCRIPTION OF DRUM AND/OR CONTENTS AS NOTED IN THE MAY 22, 2000 DRUM INSPECTION AND INVENTORY TABLE
	ESI CONTAINER DESCRIPTION	CONTAINER REGISTRATION #	
529	"	"	AST - Poly 57 gal - CC-9
530	"	"	AST - Poly 57 gal - CC-9
531	"	"	AST - Poly 57 gal - Unmarked
532	"	"	AST - Poly 57 gal - CC-10
533	"	"	AST - Poly 57 gal - CC-9
534	"	"	AST - Poly 57 gal - Unmarked
535	"	"	AST - Poly 57 gal - Unmarked
536	"	"	AST - Poly 57 gal - CC-10
537	"	"	AST - Poly 57 gal - Unmarked
538	"	"	AST - Poly 57 gal - CC-10
539	"	"	AST - Poly 57 gal - CC-10
540	"	"	AST - Poly 57 gal - CC-10
541	"	"	AST - Poly 57 gal - CC-10
542	"	"	AST - Poly 57 gal - Unmarked
543	"	"	AST - Poly 57 gal - CC-10
544	"	"	AST - Poly 57 gal - CC-10
545	"	"	AST - Poly 57 gal - CC-10
546	"	"	AST - Poly 57 gal - CC-10
547	"	"	AST - Poly 57 gal - CC-10
548	"	"	AST - Poly 57 gal - CC-12
549	"	"	AST - Poly 57 gal - CC-12
550	"	"	AST - Poly 57 gal - CC-11
551	# 4 - red	4957749-4310	Steel 55 gal - PPE
BAG-1	"	"	ACM Bagged Material
BAG-2	"	"	"
BAG-3	"	"	"
BAG-4	"	"	"
BAG-5	"	"	"
BAG-6	"	"	"
BAG-7	"	"	"
BAG-8	"	"	"
CYL-1	# 6 - red	4327989-4310	Large Cylinder - Oxidizer (Empty)
CYL-2	"	"	Small Cylinder - Acetylene (Empty)

Notes:
" = Same As Above
ACM = Asbestos Containing Material
CYL = Cylinder

200 Third Avenue
Carnegie, Pennsylvania 15106
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Fax: (412) 279-4332

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Whitehouse Station, New Jersey 08889
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Fax: (908) 534-6785

185 Lancaster Street, Suite 304
Portland, Maine 04101
Phone: (207) 772-8100
Fax: (207) 772-8101